

Telangana Rythu Power Distribution Company Limited (TGRPDCL)

Responses to Objections / Suggestions

On

Licensee Application

INDEX

Sl.No.	Name and other details of the Objector	Page No
1.	Telangana Pradesh Congress Committee Gandhi Bhavan, Hyderabad	
2.	Telangana Vidhyut Joint Action Committee TRT 141, Thilak Bhavan, Street No 9, Jawahar Nagar, RTC X Road, Hyd 500020	
3.	V Raghav Convenor, Distribution Power Studies Forum, Hyderabad, Telangana, 500082	
4.	Smt.Kalvakuntla Kavitha, BRS President	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
Response to Telangana Pradesh Congress Committee		
1.	Advantages of Ryuthu DISCOM • A dedicated Ryuthu DISCOM (Agriculture-focused Distribution Company) can provide significant operational, financial, and service benefits for the power sector, farmers, and the Government. • Focused Service to Farmers: Dedicated attention to agricultural consumers, ensuring better quality of supply, specialized grievance handling, and faster restoration of interruptions. • Improved Power Supply Management: Better monitoring and management of agricultural feeders, pump sets, and rural networks leading to improved reliability and load management. • Transparent Subsidy Accounting: Clear segregation of agricultural consumption and subsidy burden helps improve financial transparency and accountability. • Efficient Energy Audit: Accurate feeder-wise and DTR-wise energy accounting helps identify losses, improve efficiency, and reduce pilferage. • Better Planning for Free Power Schemes: Dedicated DISCOM can effectively plan and implement free power schemes and government agricultural support initiatives. • Enhanced Rural Infrastructure: Focused investment in rural distribution infrastructure, including feeder segregation, high-voltage distribution	The objector has rightly pointed out that the listed advantages represent the core objectives behind the formation of TGRPDCL.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	systems, and modernization. • Specialized Workforce Utilization: Staff can be optimally deployed based on agricultural load requirements and seasonal demand. • Reduction in Cross-Subsidy Burden: Segregation of agricultural supply reduces operational stress on regular urban and industrial services. • Improved Demand Forecasting: Dedicated agricultural load analysis enables better forecasting of seasonal demand and power procurement planning. • Promotion of Solar Agriculture: Facilitates implementation of solar pump sets, feeder solarization, and renewable energy integration in agriculture. • Policy Implementation Efficiency: Government schemes related to irrigation, lift irrigation, and rural electrification can be implemented more effectively. • Consumer Satisfaction: Farmers receive focused customer support, quicker complaint resolution, and improved service quality. Expected Strategic Outcomes 1. Improved financial sustainability of power utilities. 2. Enhanced quality and reliability of agricultural power supply. 3. Better subsidy management and accountability. 4. Reduction in aggregate technical and commercial losses. 5. Strengthened rural infrastructure and farmer satisfaction.	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	6. Improved governance and operational efficiency. Conclusion: Formation of a dedicated Ryuthu DISCOM can transform agricultural power management through focused operations, improved accountability, efficient subsidy administration, and enhanced farmer-centric services.	
Response to Telangana Vidyut Joint Action Committee		
2.	4.1 Employee Service Protection – Non-Negotiable Demand The most critical issue for TGVJAC is the service protection of employees transferred to TGRPDCL. Our specific demands are: • A legally binding Tripartite Agreement must be executed between TGRPDCL, parent DISCOMs (TGSPDCL/TGNPDCL), and employee representatives BEFORE the distribution licence is granted and operational transfer commences. • All seniority rights accrued in the parent DISCOM must be fully protected and carried forward without interruption or recomputation. • Employees appointed before 01.09.2004 must be entitled to the Old Pension Scheme (OPS) as upheld by the Telangana High Court – this entitlement must be explicitly guaranteed in TGRPDCL's service rules. • Promotions, pay scales, and service benefits must be at par or better than parent DISCOM terms – no employee must suffer a disadvantage by virtue of transfer to TGRPDCL.	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.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	• A right of repatriation must be guaranteed – if TGRPDCL becomes financially unviable or is dissolved, employees must automatically revert to parent DISCOMs without break in service.	
3.	4.2 Financial Viability – A Structural Concern TGVJAC expresses serious concern about the long-term financial viability of TGRPDCL. The agricultural consumer segment is structurally loss-making in any DISCOM model: • Agricultural consumers receive supply at zero or heavily subsidised tariffs. TGRPDCL will inherit this entire subsidised segment without the cross-subsidy benefit from industrial/commercial consumers who remain with TGSPDCL and TGNPDCL. • TGRPDCL's revenue will be almost entirely dependent on State Government subsidy reimbursements. Any delay or reduction in subsidy releases will directly threaten employee salaries, pensions, and operational capacity. • Parent DISCOMs – TGSPDCL and TGNPDCL – already carry massive accumulated financial losses. Carving out agricultural consumers will further erode their revenue base and cross-subsidy pool, worsening their financial health. • TGVJAC urges TGERC to conduct a rigorous financial viability assessment of TGRPDCL's proposed revenue model before granting the distribution licence – including stress-testing scenarios where State subsidy releases are delayed by 3 to 6 months.	TGRPDCL submits that while it serves subsidized 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, which will ensure the financial viability. Additionally, 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. With government support and a structured PPA allocation, the proposed framework ensures the financial viability of all three DISCOMs.

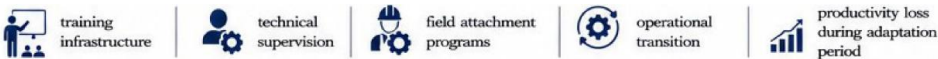
S.No.	Summary of Objections / Suggestions	Response of the Licensee
4.	4.3 Agricultural Connection Regularisation – Pending Crisis TGVJAC flags the massive backlog of pending agricultural service connections as an urgent issue that TGRPDCL must address. The transfer of this responsibility must come with adequate infrastructure, manpower, and financial allocation: • Thousands of pending agricultural connection applications remain unserved in both TGSPDCL and TGNPDCL territories. • TGRPDCL must inherit a clear, audited list of pending applications with committed timelines for release – not merely the liability without the resources. • The capital expenditure required for new connections must be ring-fenced and separately funded by the State Government – it must not become an additional burden on TGRPDCL’s operational budget.	TGRPDCL submits that the process for release of agricultural service connections, is being carried out by the incumbent DISCOMs. After the establishment of TGRPDCL and grant of licence, the responsibility for release of agricultural connections will be taken up by TGRPDCL in accordance with the existing rules and regulations. TGRPDCL also submits that the incumbent DISCOMs are releasing service connections based on feasibility and upon receipt of all required documentation. The process is being handled in a structured manner, and the same framework will continue under TGRPDCL.
5.	4.4 Asset and Liabilities Transfer – Clarity Required • The transfer of assets (substations, feeder lines, transformers, AMR meters, vehicles) from parent DISCOMs to TGRPDCL must be based on a transparent, independently audited valuation. • Existing loan obligations and power purchase agreements that serve agricultural feeders must be clearly allocated – ambiguity here will create long-term financial and legal disputes. • TGERC must stipulate clear asset-liability transfer protocols as a pre-condition for granting the distribution licence, not as a post-licensing	TGRPDCL submits that asset and liability transfer, including Power Purchase Agreements, is covered under G.O.Ms.No.44 dated 17.12.2025 and G.O.Ms.No.8 dated 08.05.2026. TGRPDCL further submits that the transfer of assets is being carried out based on physical verification of assets on the ground, which is presently in progress. The value of assets, liabilities, and receivables will be determined as on the date of transfer. These values will be finalized through a structured audit process, ensuring

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	arrangement.	transparency, accuracy, and proper accounting.
6.	4.5 Regulatory Oversight – TGERC's Critical Role TGVJAC strongly urges TGERC to exercise its full statutory powers in the following areas: • The licence application must be subjected to a full public hearing process, with adequate time for all stakeholders – including employee unions – to file objections and suggestions. • TGERC must specify performance standards, service quality benchmarks, and penalty provisions in the licence conditions – TGRPDCL must not be given a licence without enforceable obligations. • Annual financial and performance audits of TGRPDCL must be mandated and their findings placed in the public domain. • TGERC must ensure that tariff principles for agricultural consumers are clearly defined – including the mechanism for subsidy pass-through and the tariff revision cycle.	<u>TGRPDCL submits that the licence</u>~~Licensee~~ application ~~process~~ and public hearing process is <u>being conducted in a transparent manner, with transparently happening and</u> adequate <del>opportunity</del>~~time is~~ provided ~~to~~<u>for</u> all <del>stakeholders</del>~~stakeholders~~ to submit <u>their</u> objections and suggestions. Responses are <u>also</u> being provided <u>to submissions received beyond the stipulated timelines</u>~~even to objectors who have submitted objections/ suggestions after due date.~~ TGRPDCL <u>further submits that, upon grant of licence, it</u> will be <u>regulated in the same manner as</u>~~treated like any~~ other <u>DISCOMs under TGERC, and will comply with all applicable standards and requirements.</u> <u>TGRPDCL also submits that</u> Annual audit accounts will be <u>placed in the public domain as per existing practice, ensuring transparency. Tariff</u>~~shared on website like incumbent DISCOMs.~~ <u>Tariffs</u> and subsidy <u>mechanisms</u> will <u>continue to</u> be handled <u>in line with the current regulatory framework</u>~~transparently, in similar way how it is being done now.~~
7.	4.6 Constitutional and Labour Rights – Article 14 and 16 TGVJAC invokes Articles 14, 16(1), and 16(2) of the Constitution of India.	All existing service benefits and service conditions in parent utilities are continued in TGRPDCL.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	Employees transferred to TGRPDCL are entitled to equality of opportunity in public employment. Their seniority, service conditions, and career progression must not be adversely affected by an administrative restructuring decision in which they had no meaningful say. This position is backed by the Hon'ble Supreme Court's ruling in Ajit Singh vs State of Punjab (1999) which protects seniority rights of employees during inter-departmental transfers and reorganisations.	The rules and regulations are also continued on par with parent utilities.
8.	TGVJAC'S FORMAL SUGGETIONS AND VIWS BEFORE THE TGERC TGVJAC places the following SUGGETIONS AND VIWS, before TGERC and the Government of Telangana: 1. Execute a legally binding Tripartite Agreement guaranteeing service protection for all transferred employees – before TGRPDCL commences operations. 2. Restore the Old Pension Scheme (OPS) for all employees appointed before 01.09.2004, in compliance with the Telangana High Court order, across all power sector entities including TGRPDCL. 3. Ensure seniority continuity – the 4-tier seniority cascade framework in the transfer guidelines must be implemented transparently, with a grievance redressal mechanism. 4. Guarantee a right of repatriation to the parent DISCOM for all transferred employees. 5. TGERC must mandate financial viability assessment and public	Responses to these objections/ suggestions have been answered above

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	hearing before granting the distribution licence to TGRPDCL. 6. All pending agricultural connections must be regularized with dedicated capital funding – not transferred as an unfunded liability. 7. Parent DISCOMs – TGSPDCL and TGNPDCL – must be financially ring-fenced from losses arising out of the TGRPDCL formation process.	
Response to V Raghav		
9.	I respectfully submit this representation regarding the proposed allocation/appointment of employees from TGGENCO and TGTRANSCO into TGRPDCL without adequate direct Distribution field experience. Distribution utilities operate under entirely different field conditions compared to Generation and Transmission organizations. Distribution field operations involve continuous interaction with live public electrical networks and require extensive practical exposure in areas such as: • LT/Hf line maintenance • Distribution transformer operations • Breakdown restoration • Fuse-off-call rectification • Consumer complaint handling • Feeder load management • Metering and distribution loss control	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. It may be noted that all the eligible employees from GENCO, TRANSCO and DISCOMs have been given the opportunity to exercise their option in the 'Employee Options Portal'. Hence the employees meeting the criteria laid out would be from all the utilities including the incumbent DISCOMs. This will ensure that the necessary expertise in operation and management of the Distribution Network is available with TGRPDCL.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	- Field safety protocols in densely populated areas - Emergency restoration during rains, storms, and public incidents - Handling of live-line field conditions at consumer level Unlike Generation and Transmission systems, Distribution operations involve large-scale public interface and frequent field-level emergency response under hazardous conditions. Allocation of employees without substantial Distribution field exposure may lead to serious operational challenges, including: 1. Increased risk of field-level electrical accidents due to unfamiliarity with Distribution network practices, fault handling procedures, shutdown coordination, and consumer-side operations. 2. Delay in fault rectification and restoration activities affecting consumer service reliability and emergency response efficiency. 3. Possibility of operational errors during handling of LT/HT breakdowns, DTR failures, feeder isolation, and live-line maintenance due to lack of direct Distribution field experience. 4. Safety concerns for both employees and the public arising from inadequate practical exposure to Distribution field hazards, especially during emergency restoration works. 5. Administrative and technical imbalance affecting experienced Distribution employees who have worked extensively in consumer-oriented field operations for many years.	It also may be noted that power distribution is a complex function requiring experience and skill sets in various domains such as technical, commercial, procurement, regulatory, customer service etc. In addition to the above, local knowledge of the network, consumer aspects is going to be critical in ensuring quality of supply as per Standards of Performance Regulation. In view of the above aspects highlighted, TGRPDCL submits that its proposal would be optimal when compared to sourcing new members.

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	6. Distribution field work requires continuous practical experience in handling public network systems where even minor operational mistakes may result in serious accidents, equipment damage, or public safety incidents. 7. Employees from Generation and Transmission backgrounds may require extensive retraining and prolonged field exposure before independently handling Distribution operations safely and effectively. Further, providing large-scale specialized Distribution training to employees from other sectors may involve substantial financial burden to the utility in terms of:  Instead of incurring significant expenditure on retraining employees who do not possess direct Distribution experience, the utility may consider open recruitment of technically qualified candidates specifically trained for distribution operations. This approach may: improve operational efficiency, reduce long-term training expenditure, ensure availability of field-ready technical manpower, and support cost optimization for the utility. Additionally, employees from Generation organizations may already be drawing comparatively higher salary structures and service benefits. Allocation of such employees into Distribution utilities for field-oriented posts may increase financial burden on the Distribution company without	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	proportionate operational advantage. Several power utilities across India maintain clear functional distinction between Generation, Transmission, and Distribution cadres because each sector requires separate technical specialization, operational practices, and safety protocols. Therefore, it is humbly requested that the Hon'ble Commission may kindly consider: 1. Restricting direct allocation into Distribution field-sensitive posts without adequate Distribution experience. 2. Prescribing mandatory distribution competency assessment and minimum field experience criteria before such allocation. 3. Protecting seniority and promotional opportunities of existing Distribution employees possessing substantial field experience. 4. Giving preference to experienced Distribution personnel for operational and supervisory posts in TGRPDCL. 5. Evaluating safety implications, accident risks, and financial impact	

S.No.	Summary of Objections / Suggestions	Response of the Licensee
	before approving such allocations. The above submission is made in the interest of public safety, operational efficiency, consumer service quality, financial prudence, and fair career progression of experienced Distribution employees.	
Response to Smt. Kalvakuntla Kavitha, TRS President		
10.	I, Kalavakuntla Kavitha, President of the Telangana Rakshana Sena (TRS), hereby submit my intention to participate in the public hearing pertaining to the issuance of a distribution license to TGRPDCL, scheduled to take place on May 29, 2026, at 11:00 AM at the Vidyut Niyanttran Bhavan. To ensure a thorough and equitable presentation of facts regarding this matter of immense public importance, I request you to kindly grant me an opportunity and allocate necessary time during the proceedings to present our key observations and public grievances before the Commission.	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.
~~11.~~		
~~12.~~		
~~13.~~		
~~14.~~		

S.No.	Summary of Objections / Suggestions	Response of the Licensee
~~15.~~		
~~16.~~		
~~17.~~		
~~18.~~		