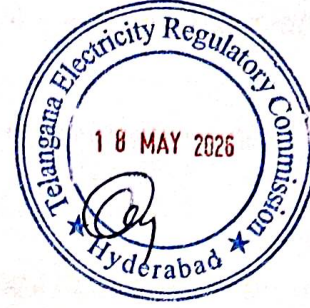


Date: 18-05-2026

To,
The Secretary,
Telangana Electricity Regulatory Commission,
Vidhyuth Niyamtran Bhavan,
GTS Colony, Kalyan Nagar,
Hyderabad-500045



From :
CH.SRINIVASU, B.Tech., LL.B(Hons), LL.M.
H.No. 3-11-294/1, Street No.1.
Sri Shankar Colony, Siris Road,
LB. Nagar, Rangareddy District.

Sir,

Sub : Public notice by Honourable TGERC Dt.18-04-2026, OP No.11/2026 - Application by TGRPDCL for sanction of Power Distribution Licence - certain constitutional violations, objections, suggestions, opinions - submission - Reg.

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1) I, Cherukupalli Srinivasu, S/O. Narahari, 56Yrs, Occupation Asst Divisional Engineer, DPE, Hyderabad South Circle, TGSPDCL having vast 32 years engineering experience in power distribution system in urban areas as well as in rural agricultural areas here with submitting to Honourable Telangana State Electricity Regulatory Commission, Hyderabad about **Constitutional violations**, suggestions, opinions and objections in respect "Application for Grant of License to Third DISCOM TGRPDCL":

2). Government of Telangana State issued (1) G.O.Ms.No.4, Dated: 11-03-2026 and (2) G.O.Ms.No.44, Dated: 17-12-2025 formulating a new Rythu Power Distribution Company to serve the consumers of Agricultural Consumers, Lift Irrigation Pump Consumers, Drinking water supply Govt entities like Mission Bhageeradha, HMWWWSB, Municipalities.

3) For which newly formed TGRPDCL applied for licence with statutory licensing authority Telangana Electricity Regulatory Commission, for which Honourable TGERC has issued public notice through newspaper on Dt.18-04-2026 calling suggestions, opinions and objections in OP No.11/2026 from the public.

4) 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 of the same batch and showing discrimination and the TGRPDCL is giving **promotions irrespective of seniority**, vide G.O. Ms No. 44, Dt.17-12-2026 This is a **violation of Article 14 of Indian Constitution**.

(Cont. in P.2)

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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 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 **tempt them to opt TGRPDCL** during options exercise, which is nothing but "Quid Pro Quo" which is **violation of Article.16, Clause(2), Clause (4A) and Clause (4B) 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 with the senior officers from the involved entities. Which is observed in bifurcation of AP State into AP State and Telangana State, APSEB into APTRANSCO and APGENCO, APTRANSCO into APCPDCL, APEPDCL. APCPDCL into TGSPDCL and TGNPDCL. But, here No High Level Committee was formulated and the successive entity, I.e., TGRPDCL called for Staff options of other entities employees and executing the options exercise.

This is **"Nemo Judex in Causa Sua", which is a violation of natural justice.**

D) G.O. Ms No.44 states no new posts are to be created by newly formed TGRPDCL, and should be shifted from existing power sector entities TGTRANSCO, TGGENCO, TGSPDCL and TGNPDCL. But the number of posts to be shifted from the existing entities was neither confirmed nor notified, but options were executed by TGRPDCL from the existing other 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", the junior officer becomes a senior officer and they are supposed to work in parallel at the same geographical area from their respective companies, which creates unrest in employees.
Which is against natural justice.

F) An organisation of TGSPDCL has no administrative jurisdiction over the other organisation employees of TGTRANSCO, TGGENCO, TGSPDCL and TGNPDCL. But, TGRPDCL is issuing Promotion to the opted employees, those are not yet employees of TGRPDCL.
This is "Nemo Judex in Causa Sua" and a violation of natural justice.

5) The necessity and essentiality 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.
But it was not done.



(Cont. in P.3)

6) **"Existing Power Supply difficulties - Overcoming solutions by TGRPDCL"** are to be clarified to stake holders like Farmers, Irrigation Entities, Drinking Water supply entities, Lift Irrigation entities.

7) No Committee has made a 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.**

8) The existing Lines Network utilisation and maintenance was not yet clarified neither by existing Distribution Company nor the Third Discom. 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 which leads to "Disturbance of Existing Quality Power Supply"

9) At present, there is an 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 an increased burden on the existing continuing staff, which is not viable and maintainable, which causes prolongment of restoration of power supply during power failure, which causes **further delay in restoring power supply to the consumers who are situated in scattered areas.**

10) Discom Authorities Duplication of geographical jurisdictions leads to **confusion in the consumers and ambiguity in Concerned area officers.**

11) Utilisation of the same infrastructure like Electrical Lines, Poles, Power Transformers etc by two different entities like existing DISCOM and Third Discom **poses utilisation issues, maintenance etc.**

12) Tripartite Agreement was signed before the formation of existing Discoms after elaborated discussions about the employees 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.**

13) 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.**

14) As we seen in Newspapers Dt. 04-05-2026, Andhrajyothi daily, 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 by extending power supply to Farmers, RWS, Mission Bhagiratha **without revenue collections for a prolonged period from the government for the supplied consumption.**

(Cont. in P.4)



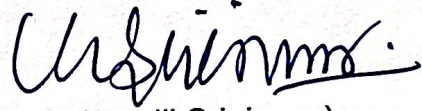
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15) The third Discom can not survive without revenue collections from the Govt and the Employees will suffer for Salaries. For which, government has to arrange staff salaries on par with government employees salaries financial head of account "Salaries - 010"

In view of the above, the Formation of Third Discom is not a solution to improve the quality power supply and requesting the Honourable TGERC to examine the above Constitutional violations, objections, opinions while granting the License to newly forming third DISCOM, I.e., TGRPDCL.

Thanking you sir,

Your's faithfully,



(Cherukupalli Srinivasu)

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