



To
The Secretary,
Telangana State Electricity Regulatory Commission (TSERC),
Hyderabad.

Subject: Representation regarding allocation of employees without adequate Distribution field experience into TGRPDCL

Respected Sir/Madam,

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/HT line maintenance
- Distribution transformer operations
- Breakdown restoration
- Fuse-off-call rectification
- Consumer complaint handling
- Feeder load management
- Metering and distribution loss control
- 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.
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:



training
infrastructure



technical
supervision



field attachment
programs



operational
transition



productivity loss
during adaptation
period

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 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 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.

Yours faithfully,



(V. Raghav)
Convenor

Distribution Power Studies Forum

