

Telangana Electricity Engineers' Association



(Recognised, Regd.No. 319/07)

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Dt. 18.05.2026

BEFORE THE HON'BLE TELANGANA ELECTRICITY REGULATORY COMMISSION

Sub: Objections / Suggestions on the Proposal for Grant of License to the Proposed New DISCOM (TGRPDCL)–Protection of Employee Interests and Service Conditions –Reg.

Respected Sir,

We, the Telangana Electricity Engineers Association, representing Engineers working in TGTRANSCO, TGGENCO, TGSPDCL and TGNPDCL, respectfully submit the following objections and concerns before the Hon'ble Commission with regard to the proposal for creation of the new DISCOM namely TGRPDCL.

At the outset, we submit that the engineers and employees of the existing Power Utilities have been rendering uninterrupted and efficient services to all categories of consumers, including agricultural consumers, under highly demanding and challenging field conditions. The proposed restructuring directly impacts the employees working in the existing Utilities and therefore the employee-related issues require comprehensive consideration before any decision is taken.

1. 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.

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
- 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. 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.
- 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. 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, breakdown restoration and consumer grievances under difficult field conditions.

Further reduction in manpower will result in:

- 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 accurse to the employees who continue to serve in the existing Utilities.

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
- 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. Protection of Pension and PF Benefits

We further submit that the "Master Trust" 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.

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, 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.

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.

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.

In view of the above facts and circumstances, we humbly request the Hon'ble Commission to:

1. Protect the service conditions and welfare of employees working in all existing Utilities.
2. Ensure that no sanctioned posts are suppressed or diverted from existing Utilities.
3. Safe guard promotional avenues and career progression of employees.
4. Ensure continued implementation of the Tripartite Agreement.
5. Protect Pension and PF benefits under the existing Master Trust mechanism.
6. Financial viability and practical operation of 3RD Discom is not possible.
7. Set aside/withhold the grant of licence to TGRPDCL until all employee-related concerns are comprehensively addressed.

We sincerely request the Hon'ble Commission to consider the above objections in the interest of employees, organizational stability and efficient functioning of the power sector in the State.

Yours faithfully,


GENERAL SECRETARY,
Telangana Electricity Engineers Association