



TELANGANA ELECTRICITY ASSISTANT ENGINEERS' ASSOCIATION

(Regd No:108/2016)

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To
The Hon'ble Chairman,
Telangana Electricity Regulatory Commission (TGERC),
Vidyuth Nyantran Bhavan,
GTS Colony, Kalyan Nagar,
Hyderabad - 500045.

TEAEA/CEC/Conversions/D.No. 21 /26/Dt: 28.05.2026

Respected Sir,

Sub:TEAEA-Regd. No. 108/2016-submission of
Representation / Objections on the Proposal for
Formation of Telangana Rythu Power Distribution
Corporation Limited (TGRPDCL) - Protection of Employee
Interests, Consumer Welfare, Operational Stability, and
Public Sector Power Utilities - Reg.

Ref: 1. TGRPDCL

It is to submit that **TELANGANA ELECTRICITY ASSISTANT ENGINEERS' ASSOCIATION(TEAEA)** was registered under the AP Societies Registration Act-2001 on 13.02.2016 vide Reg.no:108/2016 for welfare of Power sector and Assistant Engineers.

We, the Telangana Electricity Assistant Engineers Association, respectfully submit the following representation regarding the proposal for formation of Telangana Rythu Power Distribution Corporation Limited (TGRPDCL).

At the outset, we submit that the existing Telangana Power Utilities namely TGSPDCL, TGNPDCL, TGTRANSCO and TGGENCO have been rendering uninterrupted and efficient power supply to all categories of consumers including agricultural consumers under highly challenging field conditions. Engineers and field employees are continuously working round-the-clock for operation, maintenance, breakdown restoration, emergency duties,

management, rural electrification, protection systems, commercial activities, vigilance activities, system strengthening and public service responsibilities.

While reforms aimed at strengthening the power sector are always welcome, any restructuring exercise should protect employee interests, consumer welfare, operational stability, financial sustainability, and long-term public ownership of the power sector.

In this regard, we humbly submit the following points for kind consideration:

1. Formation of New DISCOM Without Creation of Adequate Additional Posts is Impractical

The proposal for creation of a separate Rythu DISCOM without adequate creation of additional engineering, technical, operational and supporting staff posts may severely impact the functioning of the existing utilities.

Presently, employees are already working under severe manpower shortage due to non-recruitment of Engineers and technical staff for several years. Existing field officers are handling multiple responsibilities simultaneously including:

- Operation & Maintenance
- Breakdown Restoration
- Fuse-off-call attendance
- Consumer grievance redressal
- Rural electrification works
- Protection and safety operations
- Commercial activities
- Vigilance and DPE activities
- Load management and emergency operations
- System improvement and network strengthening works

Diversion or suppression of experienced manpower from existing utilities may create operational vacuum and increased burden on remaining employees.

2. Existing Utilities are Already Efficiently Serving Agricultural Consumers

The present DISCOMs are already effectively supplying quality power to agricultural consumers through existing operational infrastructure.

At present, AE/Operation offices are functioning at Mandal headquarters level, enabling quick accessibility and faster response to farmers. Field officers are immediately attending transformer failures, line breakdowns, agricultural supply interruptions and emergency complaints.

Under the proposed restructuring, larger operational jurisdictions may reduce field accessibility and delay service delivery to agricultural consumers.

Hence, the proposal may not significantly improve agricultural services but may instead create operational and administrative complexities.

3. Financial Sustainability and Cross Subsidy Concerns

The proposed segregation of subsidized consumer categories into a separate DISCOM raises serious financial sustainability concerns.

The existing DISCOM structure presently functions through cross-subsidy balancing between different consumer categories. Separation of subsidized agricultural consumers into an independent DISCOM may weaken the financial structure of both existing DISCOMs and the proposed Rythu DISCOM.

A DISCOM catering predominantly to subsidized consumers may become entirely dependent upon timely Government subsidy releases for:

- Power purchase payments
- Employee salaries
- Maintenance activities
- Statutory dues
- System strengthening works

Any delay in subsidy release may lead to financial stress, increased borrowings, interest burden and operational instability.

Therefore, assured advance subsidy mechanism from Government is essential before implementation of such restructuring.

4. Risk of Future Privatization and Public Sector Dilution

Employees across Telangana power utilities are expressing serious apprehension that segregation of subsidized consumers into a separate DISCOM may eventually become a precursor for privatization or franchise-based models in the remaining commercially viable DISCOMs.

Experiences observed in certain other states indicate that fragmentation of public utilities and separation of high-revenue and subsidized consumers may gradually increase private participation in core public utility operations.

The Telangana power sector has been built with public investment, technical expertise, and employee dedication over several decades. Therefore, public ownership and Government control of DISCOMs should be protected permanently in the interest of consumers, employees and the State economy.

Clear policy assurances may kindly be provided that no future privatization or franchise-based operation will be introduced in Telangana power distribution sector.

5. Impact on Promotions and Career Progression

Employees in existing power utilities are already facing delays in regular promotions due to prolonged stagnation and pending service matters.

In such circumstances, restructuring should not disturb existing promotion channels, seniority structure, or career progression opportunities of employees working in TGSPDCL, TGNPDCL, TGTRANSCO and TGGENCO.

The proposed organization structure should ensure equal promotional opportunities and avoid creation of imbalance between employees working in different utilities.

6. Safety Risks and Operational Accountability

At present, the existing integrated network structure enables unified operational control over 11KV feeders, DTRs, LT lines, shutdown operations and line-clear procedures.

Segregation of only agricultural DTRs and LT systems while retaining common upstream network infrastructure may create serious ambiguity regarding:

- Line Clearance (LC) procedures
- Shutdown responsibility
- Breakdown accountability
- Maintenance jurisdiction
- Accident responsibility
- Safety supervision
- Restoration authority during emergencies

Such operational overlap may increase the possibility of wrong line clearances, coordination failures and electrical accidents.

Before implementation, detailed operational protocols and safety mechanisms should be clearly defined to avoid risk to employees, consumers and public property.

7. Need for Separate Supporting Wings and Infrastructure

If a separate DISCOM is proposed, independent supporting wings should also be established including:

- Vigilance Wing
- DPE Wing
- Material Management Wing
- Energy Audit Wing
- Technical Support Wing
- Anti-Power Theft Squads
- Commercial Monitoring Wings
- Safety Wings
- Dedicated Maintenance Staff

Without independent operational support structure, the proposed organization may face serious administrative and technical difficulties.

8. Supplier of Last Resort and Consumer Protection Mechanism

The proposal does not clearly explain the mechanism for ensuring continuity of power supply in situations involving:

- Financial distress
- Operational failure
- Emergency system breakdowns
- Delayed subsidy payments
- Power purchase disputes

Electricity being an essential public service, continuity of supply must remain fully protected under all circumstances.

The regulatory framework should clearly define the “Supplier of Last Resort” mechanism to ensure uninterrupted service to agricultural consumers and essential public services.

9. Concerns Regarding Metering and Field-Level Practical Difficulties

Large-scale agricultural DTR metering involving lakhs of DTRs may create practical operational challenges in remote rural areas.

Field conditions including:

- Lack of communication network coverage
- Open agricultural environments
- Damage by animals and weather conditions
- Cable deterioration and burning
- Maintenance accessibility issues
- Safety risks in open installations

may significantly affect reliability and maintenance of smart metering infrastructure.

Without adequate field-level feasibility studies, large-scale implementation may impose heavy financial burden on utilities and ultimately on consumers.

10. Protection of Employment Opportunities in Telangana

At a time when thousands of Electrical Engineering graduates and diploma holders are facing unemployment, the focus should be on strengthening public utilities through fresh recruitment and infrastructure expansion.

Large-scale retirement of experienced employees is already creating manpower gaps in field operations. Instead of reducing or diverting posts, recruitment of new Engineers, Assistant Engineers, Sub Engineers, Technicians and field staff should be taken up regularly to strengthen public utility services.

11. Protection of Consumer Interests and Quality Supply

The primary objective of power sector reforms should remain improvement of consumer service, quality power supply, and operational reliability.

Consumers should not face:

- Confusion regarding operational jurisdiction
- Delay in complaint resolution
- Multiple authority coordination issues
- Uncertainty regarding service accountability
- Tariff instability in future

A unified and strengthened public utility system may better serve long-term consumer interests compared to fragmented operational structures.

12. Need for Strengthening Existing DISCOMs Instead of Fragmentation

Instead of organizational fragmentation, existing DISCOMs may be strengthened through:

- Recruitment of adequate staff
- Infrastructure modernization
- Feeder strengthening
- Advanced monitoring systems
- Reduction of technical losses
- Improved subsidy support mechanisms
- Better financial restructuring
- Enhanced maintenance systems

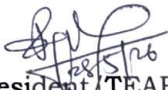
Such strengthening measures may provide better long-term benefits to consumers, employees and the Government.

In view of the above submissions, we respectfully request the Hon'ble Commission to carefully examine all employee, consumer, operational, financial and public interest aspects before granting approval for the proposed TGRPDCL.

This association, further request that employee security, public ownership, consumer welfare, operational safety, employment opportunities, and long-term stability of Telangana power sector may kindly be protected in the larger interest of the State and its people.

Thanking you, Sir.

Yours faithfully,


President TEAEA

Copy Submitted to

The Chairman and Managing Director/ TGRPDCL/ HYDERABAD