

TELANGANA STATE ELECTRICITY SC&ST EMPLOYEES' WELFARE ASSOCIATION

Regd. No. 621/2014 (Approved by the Board)

H.O:Dr.B.R.Ambedkar Spoorthi Bhavan, Mint Compound
Kahairatabad, Hyderabad, Telangana.



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Dt: 18.05.2026

To
The Secretary,
Telangana State Electricity Regulatory Commission,
S. No.145, Vidyut Niyantran Bhavan,
GTS Colony.
Hyderabad-45.



Respected Sir,

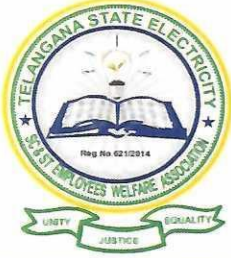
Sub: TGRPDCL – Submission of Detailed Representation by Telangana State Electricity SC & ST Employees Welfare Association (TSESCSTEW) regarding Protection of Constitutional Safeguards, Rule of Reservation, Seniority, Employee Service Conditions, Financial Sustainability, Operational Feasibility, Public Interest Obligations and Legal Concerns in the proposed Formation of Third DISCOM – Requested – Regarding.

Ref:

1. G.O.Ms.No.44, Energy Department, Government of Telangana, Dt: 17.12.2025.
2. Guidelines issued for Telangana Rythu Power Distribution Company Limited (TGRPDCL).
3. Electricity Act, 2003.
4. Rule 33 of Telangana State & Subordinate Service Rules, 1996.
5. Energy Department Clarification Dt: 27.08.2022.
6. GO Ms.No.5, GO Ms.No.26 and GO Ms.No.2.
7. 85th Constitutional Amendment.
8. Interim Orders of Hon'ble High Court in WP No.22484 of 2024 and related cases.
9. Relevant Judgments and Principles laid down by Hon'ble Appellate Tribunal for Electricity (APTEL).

We, the Telangana State Electricity SC & ST Employees Welfare Association (TSESCSTEW), represented by the undersigned,

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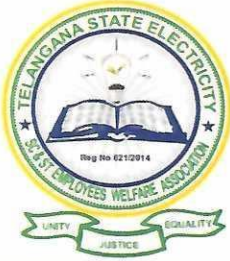
most respectfully submit this detailed representation concerning the proposed formation of Telangana Rythu Power Distribution Company Limited (TGRPDCL).

At the outset, we submit that the Association is not opposed to reforms aimed at strengthening the electricity sector, improving service delivery, or enhancing operational efficiency. However, any restructuring exercise affecting lakhs of consumers and thousands of employees must be undertaken strictly in accordance with constitutional safeguards, statutory mandates, operational feasibility, financial sustainability, principles of natural justice, and long-term public interest.

The present proposal, as reflected in G.O.Ms.No.44 and the guidelines issued for TGRPDCL, raises several serious concerns relating to:

- Protection of reservation policy,
- Consequential seniority,
- Employee service conditions,
- Inter-se seniority,
- Financial sustainability,
- Cross-subsidy framework,
- Operational feasibility,
- Staffing adequacy,
- Public service obligations,
- Legal sustainability,
- Energy accounting,
- Loss allocation,
- Sector stability,
- Employee morale,
- Future privatization apprehensions.

In view of the far-reaching consequences of the proposed restructuring, we humbly request that the following issues may kindly be examined comprehensively before implementation of the proposed Third DISCOM.



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1. Protection of Rule of Reservation (ROR), Consequential Seniority and Constitutional Safeguards

As per the guidelines issued for TGRPDCL, inter-se seniority of employees appointed by transfer is proposed to be determined based on:

- Date of promotion to the same cadre in parent organization,
- Total length of service,
- Date of birth.

While the said guideline attempts to regulate inter-se seniority after transfer, we respectfully submit that fixation of seniority, particularly in matters concerning:

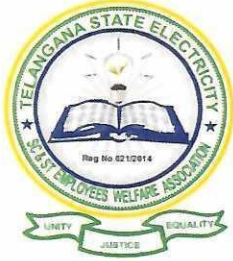
- Direct Recruitment,
- Promotions,
- Appointment by transfer,
- Integrated seniority lists,
- Future promotional avenues,

must strictly comply with Rule 33 of Telangana State & Subordinate Service Rules, 1996, by implementing Merit-cum-Roster principles under Rule of Reservation.

The Rule of Reservation is not merely an administrative arrangement but a constitutional safeguard intended to ensure adequate representation of Scheduled Castes and Scheduled Tribes in public employment.

We further submit that consequential seniority for SC/ST employees shall necessarily be implemented wherever representation is inadequate, in accordance with:

- GO Ms.No.5,
- GO Ms.No.26,
- 85th Constitutional Amendment,
- Judgments governing consequential seniority.



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Once adequacy of representation is achieved, i.e., 15% for SCs and 10% for STs, promotions may thereafter be regulated under General Seniority in accordance with GO Ms.No.2.

It is further submitted that all actions concerning restructuring, integration, promotions and seniority shall strictly comply with the interim orders passed by the Hon'ble High Court in WP No.22484 of 2024 and connected cases.

Further, Local and Non-Local status of employees shall be meticulously verified while preparing integrated seniority lists so as to avoid future constitutional and service-related disputes.

We also submit that the following proceedings/orders shall not be relied upon for determination of seniority:

- T.O.O Ms.No.954/2021,
- T.G.O.O No.62/2021,
- SP.O.O Ms.No.101/2021,
- N.O.O Ms.No.37/2021.

Any deviation from reservation roster principles and constitutional safeguards may result in irreparable injustice to SC/ST employees and lead to prolonged litigation affecting the entire restructuring process.

2. Necessity of Comprehensive Tripartite Agreement Before Restructuring

We strongly request that before implementation of restructuring or transfer of employees to TGRPDCL, a legally enforceable Tripartite Agreement shall be executed between:

- Government,
- Existing Power Utilities,
- Employee Associations/Unions.

The proposed agreement shall comprehensively safeguard:

- Existing service conditions,
- Pay protection,
- Pensionary benefits,



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- Promotional avenues,
- Reservation implementation,
- Seniority protection,
- Career progression,
- Leave benefits,
- Transfer liabilities,
- Continuity of service,
- Existing statutory protections.

The same may be modeled on the protections extended during the unbundling of APSEB into APTRANSCO, APGENCO and APDISCOMs, where employee interests were protected comprehensively.

Without such a Tripartite Agreement, employees will be exposed to uncertainty, administrative discrimination, service disputes and long-term litigation.

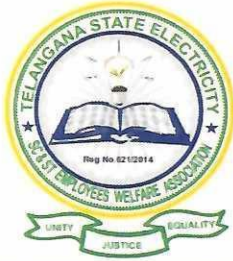
3. Financial Sustainability and Cross-Subsidy Concerns:

Under Sections 61 and 62 of the Electricity Act, tariff determination must progressively reflect cost of supply while recognizing permissible cross-subsidy mechanisms.

The present proposal effectively segregates subsidized consumer categories into TGRPDCL while retaining high-paying industrial and commercial consumers with incumbent DISCOMs.

Such segregation removes the internal cross-subsidy balancing mechanism presently sustaining the power sector.

Though the burden of subsidized consumers may appear to be shifted administratively, the actual cost of supply does not reduce. In absence of cross-subsidy, such expenditure can only be met through:



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- Massive tariff revision,
- Continuous Government subsidy support,
- Borrowings,
- Accumulation of liabilities.

A DISCOM serving predominantly subsidized consumers will have no independent revenue buffer and will become entirely dependent on timely Government subsidy releases.

Any delay in subsidy release will directly impact:

- Power purchase payments,
- Payment to generators,
- Employee salaries,
- System maintenance,
- Capital expenditure,
- Statutory obligations,
- Consumer services.

The proposed structure therefore creates a financially vulnerable utility from inception itself.

4. Mandatory Advance Subsidy under Section 65 of Electricity Act

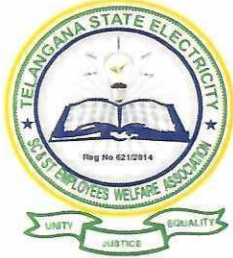
Section 65 of the Electricity Act, 2003 specifically mandates that Government subsidy shall be paid in advance to compensate the distribution licensee.

However, past experience demonstrates that advance subsidy releases are frequently delayed.

In absence of:

- Time-bound subsidy release mechanism,
- Advance payment guarantees,

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- Statutory financial protection, TGRPDCL may become operationally unstable and financially unsustainable.

The Association therefore requests that no restructuring be implemented without a legally enforceable subsidy assurance mechanism.

5. Universal Service Obligation under Section 43:

While Section 14 of the Electricity Act permits multiple distribution licensees, Section 43 imposes a mandatory universal supply obligation.

The Electricity Act fundamentally envisages area-based licensing. The proposed consumer-category-based segregation raises serious legal and practical concerns.

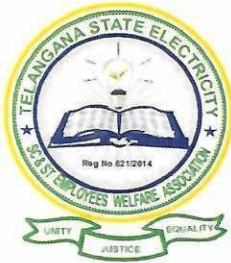
Agriculture consumers and water supply consumers are essential public utility categories requiring uninterrupted service. The proposal does not clearly specify:

- How TGRPDCL independently proposes to discharge universal supply obligations,
- Responsibility during emergencies,
- Operational coordination mechanisms,
- Supplier-of-last-resort arrangements.

In absence of clear statutory responsibility, public interest and continuity of essential services may be adversely affected.

6. Serious Apprehensions Regarding Future Privatization:

As reflected in Table-6 of G.O.Ms.No.44, high-paying industrial and commercial consumers are proposed to remain with



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incumbent DISCOMs while subsidized categories are transferred to TGRPDCL.

This restructuring significantly changes the consumer mix of existing DISCOMs and may render them commercially attractive to private sector participation in future.

Employees across the sector therefore apprehend that the formation of TGRPDCL may eventually function as a precursor to privatization or dilution of public ownership of incumbent DISCOMs.

Unless the Government provides explicit statutory safeguards against privatization, such apprehensions will continue to:

- Affect employee morale,
- Disturb industrial harmony,
- Reduce confidence among workforce,
- Affect long-term sector stability.

7. Allocation of Government Arrears and Generator Dues:

As per Table-9 of G.O.Ms.No.44, substantial liabilities including Government arrears and dues payable to GENCOs are proposed to be allocated to TGRPDCL.

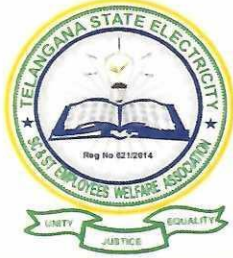
Such disproportionate liability allocation will make the proposed utility financially weak from inception itself.

Since TGRPDCL will depend heavily on Government subsidy support, any delay in reimbursement may severely affect payment capacity to GENCOs, thereby creating cascading financial stress across the power sector.

8. Severe Operational Impracticability and O&M Staff Shortage:

The proposal envisages transfer/deputation of only around 1,000 O&M personnel for maintenance of:

- More than five lakh Distribution Transformers,
- Vast agricultural LT networks,
- Rural distribution infrastructure,



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• Remote field operations.
Such deployment is practically impossible.
Already, in existing DISCOMs:

- Many substations are functioning with skeletal staff,
- Existing employees are working 12-24 hour duties,
- Two employees are handling work meant for four persons,
- Large number of vacancies remain unfilled.

Further depletion of manpower without fresh recruitment will create unbearable work burden.

It is estimated that roughly one O&M employee may be required to manage nearly two mandals, which is beyond operational feasibility.

This will adversely affect:

- Consumer service quality,
- Breakdown restoration,
- Emergency response,
- Preventive maintenance,
- Reliability of supply,
- Employee health and safety.

9. Inter-Se Seniority Complications and Litigation Risks

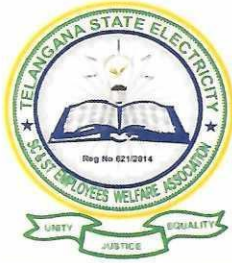
Permanent transfer of employees from:

- TGTRANSCO,
- TGGENCO,
- TGSPDCL,
- TGNPDCL,

into a newly created utility will create enormous complexity in:

- Inter-se seniority,
- Reservation roster integration,
- Promotion channels,
- Local/Non-local status,
- Career progression.

Such issues are highly prone to prolonged litigation and administrative disputes.



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10. Out-of-Turn Promotions and Violation of Equality Principles

The proposal reportedly offering out-of-turn promotions to employees opting for TGRPDCL is contrary to:

- Existing service rules,
- Fundamental principles of equality,
- Seniority norms.

If juniors bypass seniors for promotion merely due to transfer, it will create:

- Serious service disputes,
- Loss of employee morale,
- Administrative dissatisfaction,
- Legal challenges,
- Breakdown of institutional discipline.

11. Energy Accounting, Metering and Settlement Issues

The proposal lacks clarity regarding:

- Feeder-wise accounting,
- DTR-wise accounting,
- Consumer-wise accounting,
- Inter-DISCOM settlement,
- Interface metering.

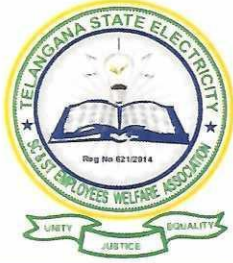
Earlier attempts of agricultural transformer metering faced serious technical and communication constraints.

Reliance upon inaccurate accounting methodologies may create disputes during:

- ARR proceedings,
- True-up exercises,
- Tariff fixation,
- Power purchase cost allocation.

12. Power Purchase Cost Allocation during Peak Demand

During peak demand hours, power purchase cost becomes significantly high.



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The proposal relying upon approximately 5.3 lakh AGL interface meters for D-D settlement raises serious concerns regarding:

- Accuracy,
- Auditability,
- Reliability,
- Cost attribution.

Any ambiguity in allocation of power purchase cost may lead to serious disputes before regulatory authorities.

13. Loss Norms and Accountability Issues

Energy input to TGRPDCL is proposed to be accounted at LT level while 11 KV infrastructure remains under incumbent DISCOMs.

However, the proposal does not clearly specify:

- Responsibility for excess technical losses,
- Commercial loss accountability,
- Treatment of excess losses,
- Pass-through eligibility.

Without clear accountability, tariff determination and true-up proceedings may become legally unsustainable.

14. Operational Control, Outages and Emergency Restoration

The proposal does not clearly demarcate responsibility during:

- Outages,
- Voltage fluctuations,
- Transformer failures,
- Emergency restoration,
- Grid contingencies,
- Essential service interruptions.

Absence of clarity may create dangerous confusion at field level and adversely affect reliability of public supply.



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15. Recovery of True-Up Costs:

In a DISCOM predominantly serving subsidized consumers, recovery of true-up costs through tariff is practically difficult. In absence of cross-subsidy support, such liabilities may accumulate as regulatory assets causing long-term financial instability.

16. Employees from TRANSCO and GENCO Lack Distribution Experience:

Employees permanently absorbed from TGTRANSCO and TGGENCO may not possess practical field-level distribution experience required for large-scale rural distribution management.

Without proper staffing pattern and adequate experienced field personnel, operational efficiency of TGRPDCL may suffer seriously.

17. Adverse Impact on Existing DISCOM Employees

If vacancies are suppressed and manpower is diverted without fresh recruitment:

- Existing employees will lose promotional opportunities,
- Work burden will increase,
- Employee stress levels will rise,
- Service delivery standards may deteriorate,
- Consumer grievances may increase.

This may ultimately affect the objective of providing quality uninterrupted power supply.

18. Request for Immediate Intervention and Reconsideration:

In view of the above serious constitutional, legal, financial, operational and employee-related concerns, we humbly request that:

1. Rule of Reservation and consequential seniority shall be implemented strictly.



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2. A comprehensive Tripartite Agreement shall be executed before restructuring.
3. Existing service conditions and promotional avenues shall be fully protected.
4. Adequate staffing and fresh recruitment shall be ensured.
5. Financial sustainability of TGRPDCL shall be reassessed comprehensively.
6. Clear safeguards against privatization shall be issued.
7. All employee associations and stakeholders shall be consulted transparently.
8. No employee shall be subjected to discrimination or loss of service benefits.
9. Legal and operational feasibility of the proposal shall be re-examined comprehensively before implementation.

We therefore request your good offices to kindly examine the above concerns in the interest of employees, consumers, constitutional justice, operational stability and long-term sustainability of Telangana power sector.

Thanking You,

Yours faithfully,

(Ramesh Medi) 18/05/26
Secretary General

Copy Submitted To:

1. The Special Chief Secretary, Energy Department, Government of Telangana.
2. The Chairman & Managing Director, TGTRANSCO.
3. The Chairman & Managing Director, TSGENCO.
4. The Chairman & Managing Director, TGSPDCL.
5. The Chairman & Managing Director, TGNPDCL.
6. The Chairman & Managing Director, TGRPDCL.