BEFORE THE TELANGANA STATE ELECTRICITY REGULATORY COMMISSION

5th Floor Singareni Bhavan, Red Hills, Hyderabad – 500 004

OP No. 76 & 77 of 2015

IN THE MATTER OF

Petition requesting the Commission

- 1. To direct DISCOMs to improve safety and avoid deaths due to shocks.
- 2. To allow the objector to be heard in person before the Commission takes any decision on this application of the DISCOMs.

IN THE MATTER OF Name and full address of the petitioner:

Jana Vignana Vedika & Praja Science Vedika

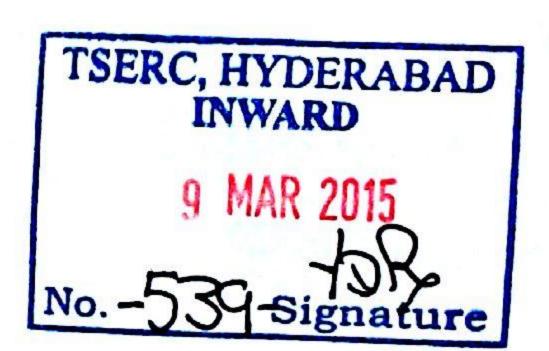
Represented by

Dr. L. Muralidhar,
Jana Vignana Vedika and Praja Science Vedika,
42-242, Newtown colony,
Praja Vaidyashala
Wanaparthy,
Mahaboobnagar.

And

Name and address of the Respondents:

Chairman and Managing Director
Northern Power Distribution Company of Telangana Ltd,
Southern Power Distribution Company of Telangana Ltd,



BEFORE THE TELANGANA STATE ELECTRICITY REGULATORY COMMISSION

5th Floor Singareni Bhavan, Lakdi-ka-pool, Red Hills, Hyderabad – 500 004

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AFFIDAVIT VERIFYING THE MEMORANDUM OF OBJECTIONS

I, Dr. L.Muralidhar, S/o L.Ramachandra Rao, do hereby solemnly affirm and state as under:

- 1. I am the representative of Jana Vignana Vedika and Praja Science Vedika, the applicant in the above matter and am duly authorised by the said applicant to make this memorandum of objections on its behalf.
- 2. The statements made in the paragraphs of the accompanying memorandum of objections now shown to me are true to my knowledge, derived from the Filing of ARR and Proposed Tariffs for FY 2015-16 of the two DISCOMs and the material gathered by JVV, PSV and made available to me and are based on information and advice received which I believe to be true and correct.

Solemnly affirm

Deponent L. Musellander

07 - 03 - 2015

Hyderabad

BEFORE THE TELANGANA STATE ELECTRICITY REGULATORY COMMISSION

* 4th Floor Singareni Bhavan, Lakdi-ka-pool, Red Hills, Hyderabad – 500 004

The following suggestions and objections are filed in response to the Public Notice published in the newspapers on 11th February, 2015.

Deaths due to shocks

Every year hundreds of farmers are meeting death due to electrical shocks. This is highly avoidable.

During 2013-14 in Telangana 436 people died due to electrical shocks. More than 50% of these cases under SPDCL took place in the circles/districts of Mahabubnagar and Nalgonda. Similar is the case in the first half of 2014-15. Further these figures are an under estimate of the reality. Farmers are the main victims of this phenomenon.

Table: Deaths Due to Electric Shocks

	2013-14	First Half of 2014-15
NPDCL	185	87
Mahabubnagar	115	69
Nalgonda	84	25
SPDCL	251	129
Total Telangana	436	216

The DISCOMs did not provide complete details of these incidents like for how many cases DISCOMs took responsibility and in how many cases compensation was paid and amount paid towards compensation. NPDCL mentioned that compensation was paid in 56 cases out of 185 deaths in 2013-14 and in 11 cases out of 87 deaths during the first half of 2014-15. Procedures need to be simplified to see that all victims receive compensation at the earliest.

Even in the electrocution deaths that the DISCOMs had taken responsibility the amount paid (about Rs. 1 lakh per person) is very meagre. Even this meagre amount was not paid properly. There is need to revise the compensation upwards like in the case of railways.

There shall also be separate mechanism to pin responsibility for deaths due to electricity shocks. In the present case perpetrator it self is the judge. To avoid this anomaly a committee comprising different stakeholders shall go into these deaths and pronounce whether DISCOMs are responsible for these tragedies or not.

More than this these deaths are highly avoidable. These deaths are taking place due to neglect of rural network by the DISCOMs. Every year the Commission allowed Rs. 5 crore to be spent by the DISCOMs on safety measures to avoid such deaths. But DISCOMs did not care to utilise them. NPDCL spent Rs. 34.25 lakh during 2013-14 and Rs. 12.29 lakh during first half of 2014-15. If the safety of DTRs were improved many of these deaths could have been avoided.

In most of these cases it was the farmers who met this tragic end. These deaths could have been avoided if there were timely and sufficient technical support at the ground level and good quality electrical network. Most of the technical posts like linemen in rural areas are vacant and farmers are forced to attend to repair work on their own with fatal consequences. Thousands of junior line men posts are lying vacant since a long time. Recently Telangana State Government announced that hundreds of electrical engineers will be recruited shortly. But there is no word about recruiting junior line men. Filling junior line men posts not only bring down deaths due to shocks but also help to bring down T&D losses and their by add to the income of the DISCOMs.

Quality of Power

Electricity received by the farmers was of uneven quality with unpredictable interruptions. Power supply timings announced by the Licensees are not being adhered to. It is the responsibility of the Commission under Section 86 (1) (i) of the Electricity Act, 2003 to enforce standards with respect to quality, continuity and reliability of service by licensees.

In the past DISCOMs used to post feeder-wise electricity supply details on their websites. But they stopped this practice suddenly some time back. We request the Commission to direct the DISCOMs to post all relevant information on quantum and quality of supply on their websites.

DTR failure/repair

DISCOMs are also not attending to maintenance of DTRs properly. Farmers are being forced to incur expenditure in transporting the DTRs. DTRs are also not being repaired in time. In Kanugutta village of Both mandal in Adilabad district it took 10 days to repair the DTR. In Madaka village of Odelu mandal in Karimnagar district it took more than one week to repair the transformer while under Standards of Performance DTRs in rural areas shall be repaired within 48 hours.

Low quality of power in rural areas is also because of crumbling transmission and distribution network in rural areas. Decades old conductors are hanging low endangering lives as well as resulting high transmission losses. Many of the DTRs are more than decade old and should have been replaced. Added to this many of these DTRs do not have even AB

switches. Depreciated and old parts of T&D network shall be replaced in keeping with prudent maintenance of the network in good health.

DSM Measures

To be eligible for free power, farmers have to undertake demand side management (DSM) measures i.e., installation of capacitors, ISI marked pump sets, HDPE or RPVC piping and frictionless foot-valve. These measures are proposed to bring down quantum electricity consumption in the agriculture sector there by reducing financial burden both on the state government and farmers. Farmers also would like to contribute to this endeavour. Though farmers are interested in taking them up they are facing hurdles in implementing them.

DISCOM officials are claiming that more than 90% of the farmers have installed capacitors. But truth is that not even 10% of the farmers installed capacitors. Thousands of junior line men posts in rural areas are lying vacant. Even where junior linemen or assistant linemen are available they do not have proper knowledge in installation of capacitors. Installation of capacitors at a wrong point led to burning of pump sets, which scared other farmers from doing the same.

A pilot implemented by SPDCL (p.88) power consumption declined by nearly 10% after installation of capacitors. This implies that by spending Rs. 60 crore to install capacitors at 20 lakh pump sets in Telangana DISCOMs will be able to save about Rs. 500 crore. This alone shall spur the DISCOMs to implement capacitor programme on war footing.

Use of ISI standard pump set is another important DSM measure. Present pump set efficiency in the State is only 25% and this could be increased to 50% by using ISI standard motors. For proper operation of ISI standard pump sets minimum voltages are required. Under prevailing low voltages in the state these ISI motors do not work. Because of this low voltage, farmers are forced to go in for locally made pump sets which operate even under low voltages. One of the reasons for low voltage is overloading of distribution transformers (DTR) installed for agricultural purposes. This overload is to the extent of 25 to 50%. If this overload problem is addressed successfully farmers can think of using ISI standard motors. This can be addressed by increasing the number of DTRs of adequate capacity in the agriculture sector. We request the state government and DISCOMs to install additional DTRs to solve low voltage problem so that farmers will be emboldened to go in for ISI standard motors.

Though the farmers may be willing to install ISI standard motors in the event of voltages improving the financial burden on them will be onerous and it will be good to explore the ways of minimizing burden on them in replacing the non-standard motors with ISI standards motors. In Tamil Nadu, the State government and utilities are said to have taken up a programme where a third party — Electricity Service Company (ESC) — takes the responsibility of replacing the motors and is given a share in the savings of electricity

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consequent to installation of standard motors. We request the State government to explore this option also as it will not burden the state government as well as the farmers.

Prayer to the Commission:

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- 2. To allow the objector to be heard in person before the Commission takes any decision on this application of the DISCOMs.

(Dr.L.Muralidharu)

Jana Vignana Vedika and Praja Science Vedika