

To,
The Secretary,
APERC,
4th and 5th Floors, Singareni Bhavan,
Red Hills,
Hyderabad – 500 004
Ph: 23397381, 23397399.

Date: 12 – 07 – 2004

Dear Sir,

Sub: Comments on General Terms & Conditions of Supply.

Ref: Your letter No. APERC/Secy/F:GTLS-2004/D.No.1050/2004, dt.23-06-2004.

The following are my comments on the Draft General Terms and Conditions of Supply.

- 1) Many Regulations previously issued by the Commission are being reviewed in the light of the Electricity Act 2003. Also new Regulations are being formulated following the above Act. We suggest that in stead of reviewing one Regulation after another it would be better if all the Regulations are reviewed comprehensively. Also contents of different Regulations also over lap. To avoid this all these Regulations can be combined in to a single Regulation. This also will help to avoid confusion.
- 2) It would be better to provide an introductory note to the draft Regulations. This would help the lay man to understand the implications of these Regulations.
- 3) The draft Regulations are placed on the website of the Commission. But this draft do not mention the date by which comments need to be sent and such information. This can be over come by inserting the Public Notice published in the newspapers along with the draft in the website.
- 4) Regulations should be drafted in a language accessible to the general public. Present draft appears to be meant for legal community only. Also Telugu and Urdu translations of these regulations should be easily available to the public.
- 5) The Sections 3.3.2 and 3.3.3 list the different categories of the electricity consumers served by the Licensee. These categories need to be elaborated or explained in detail to avoid any confusion. For example what do the Licensee mean by the categories General Purpose and Temporary Supply.
- 6) Some of the provisions in the draft have serious implications for the consumers. For example 3.4.1 and 3.4.2 deals with the penalties to be imposed on the consumers if they violate agreements. But all the consumers are in the dark as far as such provisions are concerned. Sustained education of the consumers on these

- issues and also conscientising the employees while dealing with the consumers will help to run the organization smoothly. Otherwise it may lead to strained relations.
- 7) Section 3.4.1 deals with reclassification of consumer categories. It mentions that the reclassification be retrospective. We suggest that it be prospective only. Otherwise it may lead to harassment of the consumers.
 - 8) The draft conditions discriminate against the consumers in the matter of serving notices. While the consumer is required to serve a notice 30 days in advance (5.9.4.1), the Licensee is required to serve a notice of 7 days only (3.4.1).
 - 9) Section 5.2 deals with Requisition for Supply. This section should contain the information to be provided by the consumers, and the permits/licenses to be submitted by them to be eligible to get a connection. The Section 17.2 dealing with disconnection deals with some of these issues. Again it is not comprehensive. These two sections can be combined and further expanded.
 - 10) Some of the Sections/Sub-sections dealing with agriculture (e.g., 5.11.10) refers to 3 phase supply. But there are already single phase agriculture connections. So such sections need to be suitably modified to include single phase motors also.
 - 11) Some of the provisions of the GTCS appears to be impractical in the given condition in our state. For example Section 5.12.3 deals with efficiency index. For these one need to measure power as well as water. We do not have meters even to measure power, let alone water. This is totally an impractical proposition. Inclusion of such provisions will be headache to the licensee as well as consumers. Avoid such provisions.

We request you to consider the above points while redrawing the GTCS.

Thanking you.

Sincerely Yours,

M. Thimma Reddy
Convenor.