

**BEFORE THE ANDHRA PRADESH ELECTRICITY  
REGULATORY COMMISSION**

4<sup>th</sup> Floor Singareni Bhavan, Red Hills, Hyderabad – 500 004

**OP No. 60 & 61 of 2017**

**IN THE MATTER OF**

Petition requesting the Commission

1. To review power procurement estimates.
2. To review power purchase cost.
3. To direct DISCOMs to improve safety and avoid deaths due to shocks.
4. 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:**

People's Monitoring Group on Electricity Regulation

139, Kakatiya Nagar, Hyderabad – 500008

***Represented by***

M.Thimma Reddy

Convenor

People's Monitoring Group on Electricity Regulation

139, Kakatiya Nagar, Hyderabad – 500008

And

**Name and address of the Respondents:**

Chairman and Managing Director

Eastern Power Distribution Company of Andhra Pradesh Ltd,

Southern Power Distribution Company of Andhra Pradesh Ltd,

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## **AFFIDAVIT VERIFYING THE MEMORANDUM OF OBJECTIONS**

I, M. Thimma Reddy, son of Late M. Pothi Reddy do hereby solemnly affirm and state as under:

1. I am the Convenor of the People's Monitoring Group on Electricity Regulation (PMGER), 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 Tariff Proposals for FY 2018-19 of the two DISCOMs and the material gathered by PMGER and made available to me and are based on information and advice received which I believe to be true and correct.

Solemnly affirm

Deponent

11 –01 – 2018

Hyderabad

# BEFORE THE ANDHRA PRADESH ELECTRICITY REGULATORY COMMISSION

4<sup>th</sup> Floor Singareni Bhavan, Red Hills, Hyderabad – 500 004

The following submission of objections and suggestions on the ARR and tariff proposals of APSPDCL and APEPDCL for the year 2018-19 are with reference to the public notice dated 08-12-2017.

APEPDCL's ARR placed on the website is a scanned document. It is not a searchable pdf document and it is difficult to navigate. We request the Commission to direct APEPDCL to replace it with searchable pdf document.

## Consumption estimate:

DISCOMs	ARR (MU)	UDAY Document (MU)
APEPDCL	21,977	20,999
APSPDCL	39,566	37,591
Total	61,543	58,690

**1.1** According to ARR of APDISCOMs during the FY 2018-19 electricity requirement in Andhra Pradesh (AP) would be 61,543 MU. An examination of UDAY Document signed by both the DISCOMs and GoAP with the GoI shows that during this FY electricity requirement would be about 58,690 MU. ARR estimate of electricity requirement appears to be higher by nearly 3,000 MU entailing an additional expenditure of more than Rs. 1,500 Cr. It is important to review electricity requirement estimate arrived at by the APDISCOMs in their ARR.

## Power consumption in the past:

(MU)

DISCOM	2016-17			2017-18		
	ARR	APERC	Actual	ARR	APERC	Present Estimate
EPDCL		18,575	17,042	19,721	18,760	19,537
SPDCL		35,881	33,577	37,297	35,658	35,359
Total	55,565	54,456	50,619	57,018	54,418	54,896

**1.2** Past experience shows that actual power procurement by the DISCOMs is much less than their ARR proposals. During 2016-17 while APDISCOMs as part of ARR proposals projected energy requirement of 55,565 MU the actual procurement was only 50, 619 MU. This was much less than that allowed by the Commission also. Similarly, during 2017-18 while they estimated energy requirement of 57,018 MU the actual procurement will be 54,896 MU. Given this past experience the present estimate of DISCOMs for the ensuing year 2018-19 also need to be thoroughly reviewed.

**1.3** APSPDCL projected 7.87% increase in total electricity consumption during 2018-19 while during the previous year it increased by 4.92% only. Particularly, in the case of HT consumers APSPDCL projected 10.25% increase in consumption during 2018-19 while during the previous year its consumption in fact declined by 0.24%. This trend points to the need to exercise caution while adopting DISCOMs' estimate of power consumption and procurement during the ensuing year i.e., 2018-19. Overestimation of HT sales will have adverse impact on finances of DISCOMs. Lower than projected consumption by high tariff consumers will lead to under realization of revenue and consequent increase in deficit of DISCOMs.

**1.4.1** Electricity consumption in the previous years would have been much less if DISCOMs have not projected higher consumption in the agriculture sector than the quantum allowed by the Commission. During 2017-18 in the case of APSPDCL while the Commission allowed 8,742 MU for agriculture sector the DISCOM projected consumption of 9,537 MU. Similarly, in the case of APEPDCL while the Commission allowed 2,090 MU for agriculture sector the DISCOM projected consumption of 2,251 MU. This again brings to the fore the issue of estimation of electricity consumption in the agriculture sector.

Circle	No. Pump sets	Connected load (HP)	Projected Consumption (MU)	Per HP Consumption (U)	Per HP Consumption (U) 2017-18*
<b>Vijayawada</b>	1,05,722	5,54,896	693.49	1250	1072
<b>Guntur</b>	1,11,266	5,14,027	717.25	1395	878
<b>Ongole</b>	1,75,587	8,40,947	894.22	1063	877
<b>Nellore</b>	1,68,907	8,09,814	842.39	1040	913
<b>Tirupati</b>	2,80,909	16,88,607	1884.74	1116	1075
<b>Kadapa</b>	1,58,628	10,83,128	1438.49	1328	1327
<b>Anantapur</b>	2,55,377	14,02,014	2156.86	1538	1545
<b>Kurnool</b>	1,70,569	7,97,358	1134.11	1422	1144
<b>Total</b>	14,24,965	76,90,792	9761.55	1269	1146

\*Based on 2017-18 ARR filings

**1.4.2** ARR filings for the year 2018-19 show that under APSPDCL per HP consumption of electricity by agriculture services increased compared to the filings for the year 2017-18. All Circles, except Anantapuram, registered increase in per HP consumption. This is after taking in to account replacing 65,000 pump sets with efficient ones. APSPDCL also listed 8 measures, including replacing inefficient pump sets with ISI pump sets that will bring down electricity consumption in the DISCOM area. There is also wide variation among circles in per HP electricity consumption even though the hours of electricity supply is the same for all. While per HP electricity consumption will be 1,040 units per HP in Nellore circle it will be 1,538 units in Anantapuram circle.

**1.4.3** APEPDCL through explained the method followed in estimating electricity consumption in agriculture sector it only stated grid connected pump sets consumption as 2,296 MU. It did not provide information on number of agriculture services, their connected load and electricity consumption circle wise.

**1.4.4** Though both the DISCOMs claim that they are following the sample methodology as recommended by ISI and the Commission it is difficult to say how far they have followed the said methodology. According to Section 1.3 h) iv) of Tripartite MoU under UDAY APDISCOMs have to achieve 100% Distribution Transformer (DT) metering by 30<sup>th</sup> September, 2017. We request the Commission to direct the DISCOMs to estimate agriculture consumption on the basis of readings of meters installed at the DTRs serving agriculture services. This will help to do away with arbitrariness of estimates of electricity consumption in agriculture sector. In this context we also would like to know the progress in metering DTRs serving agriculture connections.

**1.4.5** DISCOMs are claiming to follow scrupulously state government's policy regarding Agriculture DSM measures. For example, APSPDCL in the ARR for FY 2018-19 claimed, "89.15% of the existing pump sets as on 30.9.2017 are provided with capacitors..."(p. 104) It is in no way different from its previous year claim, "So far 89.35% of the existing pump sets as on 30-09-2016 are provided with Capacitors by the consumers. The licensee is taking all necessary steps to provide Capacitors for balance pump sets also." (p.64, ARR 2017-18) In its 2016-17 submission APSPDCL claimed that capacitors were installed at 89.63% of agriculture services (p.64). In the ARR for 2012-13 APSPDCL claimed, "So far, 86.34% of the existing pump sets as on 31.03.2011 are provided with Capacitors. The licensee is taking all necessary steps to provide Capacitors for the balance pump sets also." (p.39) Field experiences show that the picture is completely different. There are definite benefits from installing Capacitors. We request the Commission to institute a sample survey to verify claims of DISCOMs in this regard.

**1.4.6** Installation ISI standard efficient pump sets is another important part of Agriculture DSM measures. Recently, the Commission also allowed special programmes under both the DISCOMs to install energy efficient pump sets. The programmes are being implemented by EESL. Implementation of these programmes appears to be slow. The Commission in its Order in O.P.

No. 20 of 2017 dated 17-06-2017 directed, “The petitioner shall submit a quarterly performance and compliance report on the implementation of the project, more particularly about quantum of actual energy savings and the cost benefit analysis done through a 3<sup>rd</sup> party, the first such report becoming due by 1<sup>st</sup> August 2017.” (Para 22.j) We would like to know how far these savings are taken in to account in estimating agriculture consumption for the FY 2018-19.

**1.4.7** We request the Commission to direct the DISOMs to list off-grid and /or grid connected solar pump sets separately under agriculture services because cost of and revenue from these pump sets are different from other pump sets.

### **T&D losses**

DISCOM	2018-19					2017-18	
	Power procurement (MU)	Sales (MU)	T&D Losses (MU)	T&D Losses (%)	UDAY T&D Losses (%)	APERC T&D Losses (%)	Estimate T&D Losses (%)
EPDCL	21,977	19,751	2,226	10.13	5.44	6.95	6.72
SPDCL	39,566	34,786	4,780	12.01	10.89	8.52	8.80

**1.5.1** APEPDCL and APSPDCL show higher T&D losses during 2018-19 than they have achieved in the previous years. During 2017-18 T&D losses of APEPDCL stood at 6.72% and during the ensuing year (2018-19) these losses are estimated to be 10.13%. Similarly, in the case of APSPDCL during 2017-18 T&D losses stood at 8.80% and during the ensuing year (2018-19) these losses are estimated to be 12%. Over the period in fact these losses shall come down. ARR for the ensuing year present an opposite picture.

**1.5.2** For the FY 2018-19 the Tripartite MoU under UDAY set the AT&C losses of APEPDCL at 5.44% and APSPDCL at 10.89%. The T&D losses projected by APDISCOMs in the ARR for FY 2018-19 are higher than the levels stipulated under the Tripartite MoU. This shows that there is scope to bring down T&D losses from the levels projected in the ARRs.

**1.5.3** When the estimated T&D losses are brought down to the previous or even to lower levels the quantum of power to be procured will also come down.

### **Power availability:**

**2.1.1** APDISCOMs estimated 27,452.46 MU of energy availability from APGENCO thermal power plants during 2018-19. Total installed capacity of APGENCO thermal power plants listed under availability stands at 5010 MW. At 80% PLF these plants shall be able to generate

35,110.08 MU. This shows that the APDISCOMs under estimated power availability from APGENCO thermal power plants by 7,657.62 MU.

**2.1.2** Against projected availability of an installed capacity of thermal stations of APGENCO, including two units of SDSTPS, of 5010 MW, the DISCOMs have shown availability of 27,452.46 MU only. With a capacity of 5010 MW, 35110.08 MU can be generated with a PLF of 80%. In other words, if the thermal units of APGENCO generate power with a PLF of 80%, additional 7657.62 MU would be available to APDISCOMs.

**2.2.1** Power availability from CGS Units is underestimated. It is less than threshold level PLF as well as that was achieved during the previous year.

Station	Threshold PLF (%)	PLF during H2 FY 2017-18 (%)	PLF considered for FY 2018-19 (%)	Energy availability projected (MU)	Energy availability at threshold PLF (MU)
Ramagundam St I & II	85	89	66	1,370.00	1,764.39
Ramagundam St III	85	85	62	320.27	439.08
NTPC Talcher St II	85	96	75	1,016.15	1,151.64
Simhadri St I	85	83	66	2,507.82	3,229.77
Simhadri St II	85	79	65	988.58	1,292.76
NLC TPS II St I	80	71	56	197.44	282.06
NLC TPS II St II	80	69	56	368.45	526.36
Vallur	85	79	70	643.42	781.30
Tuticorin	85	77	61	695.21	968.74
Kudigi	85	27	40	699.99	1,487.48
Total				8,807.33	11,923.58

**2.2.2** APDISCOMs estimated availability of 8,807.33 MU from the above CGS thermal power stations. In arriving at this availability figure they have adopted lower PLF. This PLF is lower than that recorded during 2017-18. This PLF is also lower than threshold level PLF at which generators are expected to produce power. APDISCOMs shall have adopted threshold level PLF, except in the case of new plants which are yet to reach their full potential, in arriving at the estimates of energy availability. Because of adopting lower PLF in calculating energy availability during 2018-19 APDISCOMs under estimated energy availability from the above thermal power stations by 3,116 MU.

**2.2.3** This is also confirmed by APDISCOMs submission that, “The CGS stations projected 16,112 MU for FY 2018-19. But APDISCOMs have considered 13169 MU in anticipation of shortage of coal and energy requirement of APDISCOMs.” (APSPDCL ARR - p,21)

**2.3** The APDISCOMs did not include HNPCL (1040 MW) under the list of plants available during the FY 2018-19. The Commission had included this plant in the Tariff order for the FY 2017-18 among the plants to be scheduled and 1,130 MU were expected to be drawn from this plant. This plant is also included in the revised load forecast and resource plans submitted by APDISCOMs to the Commission for third and fourth control periods. The Commission has reserved the petitions for determination of capital cost and tariff and consideration of PPA related to this plant for orders. APDISCOMs did not provide any reasons for not listing the plant under the capacity available to the state during 2018-19. At 80% PLF about 7,200 MU of energy will be available from this plant.

**2.4** Even under surplus situation when most of the thermal power plants available to the state are expected to be operated at below the threshold PLF APDISCOMs proposed as a part of ARR for FY 2018-19 to procure power from bilateral purchases and from electricity exchanges. APDISCOMs are planning to invite bids for RTC power of 500 MW. APDISCOMs have projected energy availability of 12 MU per day for 3 months in H2 FY 2017-18 and 5 months in FY 2018-19 from bilateral purchases. Besides this, APDISCOMs have projected around 6 MU per day of power purchase from power exchanges to meet the deficit on need basis. (APSPDCL ARR p.31) APDISCOMs proposed to spend Rs. 531.64 crore on procuring power from bilateral and power exchanges at an average cost of Rs. 4.08 per unit. This is higher than the variable cost of thermal power plants of APGENCO which are expected to work at below their threshold PLF capacity. Given the surplus power situation and attendant fixed cost burden we request the Commission not to allow bilateral and power exchange purchases during the FY 2018-19.

**2.5** APDISCOMs have included the 400 MW solar power project to be set up by SECI at Galiveedu Mandal, Kadapa district and the 400MW solar power project being set up by APGENCO at Talaricheruvu(V), near Tadipatri, Ananthapuram District in the list of power plants available to the state as a part of ARR for FY 2018-19. These two plants do not figure in the revised load forecast and resource plans of APDISCOMs for the third and fourth control periods. APDISCOMs would be achieving RPPO stipulated by the Commission without these plants. Given the surplus power situation and the increasing power purchase costs these plants may not be allowed.

## **Power Purchase Costs**

**3.1** While APDISCOMs projected power requirement during FY 2018-19 as 61,543 MU they propose to procure 64,643 MU of power at a cost of Rs. 26,791.15 crore. 3,100 MU are proposed to be sold in the market. In the Tariff Order for the FY 2017-18 the Commission directed the Licensees to sell any surplus energy that might be available with them up to the last unit at an economically beneficial price to the maximum extent possible (para. 211). Given the present



proposal to sell part of surplus energy in the open market we would like to know the experience of APDISCOMs in disposing of surplus energy in the open market in the past years, and its contribution to bridge the revenue deficit.

**3.2** The average cost of supply during FY 2018-19 is projected to increase by 10.7% over the cost approved for the FY 2017-18. One of the reasons for this increased power purchase cost would be increased per unit fixed cost as most of the thermal power plants will be working at below threshold PLF.

**3.3** APDISCOMs under estimated power availability from APGENCO thermal power plants by 7657.62 MU. This is more than power availability projected from RTPP IV (2,426.24 MU) and DSTPS II (4,607.06 MU). Given the power surplus situation both these plants shall not be included under the list of power plant available. Also, PPA with respect to RTPP IV has not yet been approved by the Commission. Through this measure Rs. 737 crore can be saved from fixed cost burden.

**3.4** Neyveli New Thermal Power Station (NNTPS) is a new CGS which is under execution and 68.59 MU are expected to be procured from this plant at the total cost of Rs. 31.99 Crore. Under the given surplus power situation this plant may be surrendered.

**3.5** The APDISCOMs have proposed an escalation of 3% over the values of variable cost approved for 2017-18 for coal-based thermal power plants of APGENCO and CGSs. If the cost of coal and the resultant variable cost increase during 2018-19, the APDISCOMs can claim the additional expenditure under true-up. We request the Commission not to allow the proposed 3% escalation in variable cost for coal-based thermal stations.

**3.6** Power is proposed to be procured from gas based plants of Lanco and Spectrum. These plants shall not be allowed to use any alternate fuel like naphtha.

**3.7.1** APDISCOMs propose to procure 12,182.91 MU of power from renewable energy sources accounting for 18.85% of the total power to be procured during FY 2018-19. Average cost of this power will be Rs. 4.99 per unit. While there is no denying the need to promote RE power it has to be seen that it will not burden the consumers and state government unnecessarily. There is scope to bring down the cost of this power.

**Biomass:**

**3.7.2** Even when the existing biomass based power plants are operating at below their capacity due to lack of adequate biomass fuels APEPDCL has entered in to a long term PPA with Vishnu Vidyut India Ltd. in Visakhapatnam district to purchase power from its biomass based power plant with a capacity of 7.5 MW. APERC also had given consent to it through its letter dated 27.1.2017. Power from this plant will be procured at a cost of Rs. 7 per unit. In the past the Commission disallowed addition of capacity of biomass based power plants due to shortage of

fuels and consequent increase in biomass fuel prices. The present high cost of this power is due to this fact. There is no sign of any improvement in the availability of biomass fuels. There is also lack of transparency in signing PPA with this power generator. Given the high cost of this power and lack of transparency in accessing power from this plant the same shall be set aside. This will go along way in bringing down power purchase cost.

## **Solar**

**3.7.3** In the background of falling solar power prices there is need to review PPAs that APDISCOMs have entered in to in the past for procurement of solar power. In the past the Commission has consented to procure 250 MW of solar power from NVVNL at a cost of Rs. 5.96 per unit stage I of NP Kunta Ultra Mega Solar Power Project in Anantapur district. Combined with transmission cost of about Rs.3.90 per unit its total cost comes to Rs. 9.86 per unit. Equally costly is solar power from NVVNL bundled power (Rs.10.65 per unit) and NTPC Ramagundam solar power (Rs.9.35 per unit). As these PPAs are long term, stretching to 25 years, it is important to review them given the long term impact.

## **Wind**

**3.7.4.1** Wind power generators in the state are being paid generation based incentive (GBI) of Re.0.50 per unit. APERC had set the generation tariff for wind units on cost plus basis. Given this fact GBI shall be used to bring down the cost of this power for Licensees/consumers in the state. Generators are pocketing this incentive without any basis. This will help to bring down cost of wind power in the state.

**3.7.4.2** In the petition before the Commission in limiting the control period of the Regulation No. 1 of 2015 up to 31.3.2017 APDISCOMs did not envisage any capacity addition after that date based on this Regulation. It implies that no new wind power plant would be allowed at the old rate of Rs. 4.76 per Unit. New capacity additions under this category are expected to be allowed under tariff realised through competitive bidding. In the initial bidding for wind power at the national level the price realised was Rs. 3.46 per unit. During later biddings this has come down to below Rs. 3 per unit.

**3.7.4.3** In spite of their own petition to limit the control period of the applicable Regulation APDISCOMs in the current ARR filings included 917.7 MW of Axis ventures and 8 MW of ZR Green Energy under upcoming projects. The PPAs with these units have yet to receive consent of the Commission. These units shall not be allowed under the old rates based on cost plus principle. They shall be allowed only if they agree for latest price realised under competitive bidding. As already RPPO targets are met there is no need to access any more power under RE category at higher rates.

## Tariff proposals:

Deficit during 2018-19 (Rs. Cr)

Particulars	EPDCL	SPDCL	Total
ARR	12,036.46	21,429.39	33,465.85
Revenue at current tariffs	9,832.23	14,661.11	24,493.34
Non-tariff Income	329.25	155.36	484.61
Cross subsidy surcharge	78.15	255.06	333.21
Additional surcharge	33.51	139.23	172.74
Deficit	1,764.76	6,218.63	7,983.39

**4.1** APDISCOMs' filings show that both the DISCOMs together will run up a deficit of Rs. 7, 983.39 Crore during the ensuing year. Despite such a deficit both the DISCOMs did not propose any tariff hike. This may imply that the State Government is ready to shoulder any deficit through subsidy. Or is it just a ruse to deflect discussion during forthcoming Assembly session. In the recent past both the Chief Minister of AP and Minister for Power of GoAP declared that there will not be any tariff hike in future as they would be procuring renewable energy at lower cost. But their dithering in handling wind energy PPAs shows that those declarations about 'no tariff hike' are only for public consumption and in the end tariff hike will be a reality.

**4.2** The Tripartite Understanding under UDAY stipulated that Document "Government of Andhra Pradesh endeavours to ensure that tariff hikes as reflected in Annexure –B are undertaken." (Section 1.2, p) Annexure B of the MoU indicated tariff hike of 5% and total government subsidy of Rs. 3,714.80 Crore.

**4.3** If they stand by their current tariff proposals of no hike both the APDISCOMs and the GoAP have to clear the air about any surreptitious steps at a later date to hike tariffs in the name of truing up, the way it has been done in the case of FY 2015-16.

## Electrical accidents

DISCOM	2016-17		2017-18 (Up to September '16)	
	No. of fatal accidents	No. of Ex gratia paid	No. of fatal accidents	No. of Ex gratia paid
EPDCL	201	51	167	48
SPDCL	242	163	194	59
Total	443	214	361	107

**5.1** In reporting electrical accidents while APEPDCL provided information on departmental and non-departmental accidents and the number of accidents which were due to department fault APSPDCL did not provide such disaggregate information. The availability of disaggregate information would help to understand and formulate steps to tackle them.

**5.2** Despite of highlighting the issue of these electrical accidents and the need to take steps to prevent them and including the recent Commission's Regulation on electrical accidents there is no let up in incidence of these avoidable accidents. During FY 2016-17 the number of fatal accidents stood at 443. During the first half of 2017-18 this number has already reached 361.

**5.3.1** The Construction, Operation & Maintenance of electrical plant & lines especially at distribution level by DISCOMs is in a very unsafe condition. DISCOMs are not following the basic statutory safety regulations of CEA. The state government and its CEIG are not taking action on DISCOMs.

**5.3.2** At many places especially in rural areas, bare live parts in DTRs and associated bare lines and wires are not kept inaccessible to living beings. Barriers, fences and enclosures and minimum clearances to ground are not maintained so that live parts are out of reach to prevent fatal shocks as required in Regulations 58,17,37(1) and 44(1)(i) of CEA (Measures relating to safety and electric supply) Regulation, 2010

**5.3.3** For safety, isolating A B switches on H.V side of DTRs are to be kept in working condition as per Regulation 80(2)(a)(b) of CEA (Technical Standards for construction of electrical plants and lines) Regulations, 2010. At many DTRs, A B switches are stuck in closed position and do not open.

**5.3.4** As per Regulations 74(1) (2) of CEA (Measures relating to safety and electric supply) Regulation, 2010 and Regulation 78(1) and (2) of CEA (Technical Standards for construction of electrical plants and lines) Regulations, 2010, on all DTRs on H.V sides of transformers, surge diverters are to be provided to protect consumers against transient over voltages due to lightning and switching surges and protect consumers equipment getting damaged. But in almost all DTRs these are not in working condition and are disconnected.

**5.3.5** The statutory CEA (Safety requirements for construction, operation and maintenance of electrical plants and electric lines) Regulations, 2011 give very important and elaborate policy and management systems for ensuring electrical safety. Regulation 4(4) requires the supplier to provide physical/financial resources for safety management, internal and external audit of safety. Regulation 5 requires preparation and application of detailed safety manuals/ It gives what matters are to be covered (Refer schedule I & II). Regulations 6(1)(c)(ii) requires appointment of a very senior level officer for safety, working directly under Chief Executive. Regulations 6(1)(d)(e)(f)(g) gives his functions and duties like periodic inspection, audit, training, advising management on prevention of injuries. Regulation 5 of CEA (Measures Measures relating to safety and electric supply) Regulations 2010 which is being revised also deals with electrical safety officer and authorized Chartered electrical safety engineer for periodical testing and to conform to Regulation 30 & 43.

**5.3.6** To the best of our knowledge APDISCOMs are not implementing the above mandatory regulations. APERC is requested to order APDISCOMs to submit detailed report and evidence to show their top down commitment to these management level Regulations.

**5.3.7** Public awareness is very important in promoting electrical safety. APDISCOMs do not have any materials even in their websites for creating awareness in safety among general public and consumers. Recently IEEE Hyderabad Section produced a video film ([https://www.youtube.com/watch?v=a\\_7rRUxhvVs](https://www.youtube.com/watch?v=a_7rRUxhvVs)) and designed posters on electrical safety. These may be used by APDISCOMs in their work on promoting electrical safety.

**5.3.8** Accident statements / statistics are not available to public. These must be kept in public domain and submitted annually to E R C. Many Circles in DISCOMs do not discharge their statutory duty of informing details of accidents to CEIG. Auditing and accident investigations need to be reviewed by an independent agency like E R C. Action is not taken many a time by DISCOMs even when dangerous conditions are brought to the notice by public and media.

**5.4** Payment of compensation to electrical accident victims continues to be an area of concern. In APSPDCL area majority of accidents have taken place in two Circles – Anantapuram and Kurnool. 144 fatal accidents had taken place in these two circles during FY 2016-17. During the first half of 2017-18 this number stands at 106. This disappointing tack record applies to compensation also. During the FY 2016-17 in these two circles compensation was paid in 11 cases only. During FY 2017-18 compensation was not at all paid. This after the Commission has allowed separate funds to pay compensation as a part of the Tariff Order. Vijayawada and Guntur Circles present a different picture. Under Vijayawada Circle while 51 fatal accidents had taken place during the period under examination compensation was paid in 103 cases. Similarly under Guntur Circles while 38 fatal accidents had taken place during the period under examination compensation was paid in 68 cases. This also needs to be scrutinized.

### **Prayer to the Commission**

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