

ANDHRA PRADESH ELECTRICITY EMPLOYEES' UNION

(Regd.No. 1104, Recognised)



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To
The Commission Secretary,
Andhra Pradesh Electricity Regulatory Commission (APERC),
Vidyut Nyantrana Bhavan,
Dinnedevaram Road,
Kurnool – 518 002.

Letter No.GS/APEEU-1104/VJA/D.No. 68 /2026, Dated:10-06-2026.

Sir,
Sub: Request for extension of time for submission of objections/comments/suggestions in OP No. 23 of 2026 filed by M/s APRAPL seeking grant of Deemed Distribution Licence for supplying power to agricultural consumers in A.P – Reg.

Ref: Public Notice dated 27-05-2026 in OP No. 23 of 2026.

The Andhra Pradesh Electricity Employees Union (Regd.No.1104), recognized representative union of electricity employees in the State, submits this representation seeking extension of time limit for filing of comments, objections and suggestions in response to the above petition.

The petition filed by M/s Andhra Pradesh Rural Agriculture Power Limited (APRAPL) seeks grant of a Deemed Distribution Licence for supply of electricity to all agricultural consumers across the state of Andhra Pradesh. The proposal involves in making of significant policy, regulatory procedures, operational, financial and service-related implications affecting to the electricity consumers, employees, DISCOMs, and the power sector as a whole.

The issues raised in the petition require detailed examination of the petition documents, the Memorandum of Understanding entered in between Andhra Pradesh Rural Agriculture Power Limited and the A.P DISCOMs, the legal implications and consequences read with the Electricity Act, 2003, and the likely impact on the existing power distribution framework in this State.

At present, the three DISCOMs, namely A.P.S.P.D.C.L, A.P.C.P.D.C.L, and A.P.E.P.D.C.L, cater to all categories of consumers including domestic, commercial, industrial, and agricultural consumers. Agricultural consumers constitute a substantial portion of electricity consumption in Andhra Pradesh. The issue is closely linked with the State's policy of providing free power to farmers and involves significant budgetary support and cross-subsidy mechanisms. Therefore, any restructuring of agricultural power distribution has far-reaching implications for farmer welfare, State finances, and the long-term sustainability of the existing distribution utilities.

Further, the proposal has substantial financial implications. The impact on power procurement costs, subsidy requirements, existing Power Purchase Agreements (PPAs), and the financial viability of the existing DISCOMs requires detailed analysis. The Memorandum of Understanding between Andhra Pradesh Rural Agriculture Power Limited and the A.P DISCOMs does not appear to comprehensively address several of these critical issues. The proposal also raises important concerns regarding employees and manpower management. Andhra Pradesh Rural Agriculture Power Limited proposes to function as a separate distribution licensee by taking over agricultural feeders and associated consumers presently served by A.P.S.P.D.C.L, A.P.C.P.D.C.L, and A.P.E.P.D.C.L. Such restructuring may have a significant impact on the existing manpower structure and service conditions of employees working in the DISCOMs.

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The present workforce has been recruited and deployed under an integrated utility structure and is engaged in the operation and maintenance of agricultural feeders, rural and urban distribution systems, substations, feeder networks, consumer services, revenue functions, and technical and administrative activities. Employees are presently governed by common service regulations, wage settlements, pay revision frameworks, seniority structures, promotional avenues, pension schemes, and terminal benefit rules. Transfer of substantial operational activities relating to agricultural services to Andhra Pradesh Rural Agriculture Power Limited may result in redistribution of workload and reduction in manpower requirements in the existing DISCOMs. This could adversely affect cadre strength, promotional opportunities, career progression, and overall service conditions of employees. These matters require careful examination and consultation with all stakeholders before any decision is taken.

If Andhra Pradesh Rural Agriculture Power Limited operates with separate financial support or a subsidy structure while existing DISCOMs face stranded financial liabilities, disparities in financial capability may arise. This will adversely affect the following aspects relating to employees of the existing A.P Power Utilities Pay revisions, Wage settlements, Service regulations, financial benefit structures. Any bifurcation or transfer without a comprehensive study may lead to disparities in pay scales, promotional avenues, terminal benefits, pension liabilities, and other service conditions of existing employees working in existing Discoms. Employees originally recruited under a common AP power utility may ultimately be subject to different pay scales and benefits after restructuring. The existing deficiencies in Pension & Gratuity Trusts (for employees recruited prior to 01-02-1999), Gratuity Trust (for employees recruited after 01-02-1999) & leave encashment trusts also need to be comprehensively addressed before implementation of any restructuring process, so as to safeguard the retirement benefits and long-term financial security of employees.

In view of the above, various stakeholders including employee organizations, consumer associations, farmers' representatives, and the general public require adequate time to study the proposal and formulate informed views.

The provided period given in the public notice is insufficient for having meaningful discussion with stakeholder for formulation of comprehensive submissions since the matter concerns with the future structure of distribution of electricity to overall agricultural consumers across the state of Andhra Pradesh. Hence wider public participation is necessarily essential to assist the Hon'ble Commission in arriving a suitable an decision. The matter involves widely involves in the transparency, natural justice and thus effective stakeholder participation is a must. We therefore request the Hon'ble Commission to kindly extend the last date by extending at least 20 days for submission of our comments, objections, and suggestions by beyond 11-06-2026 with a request to communicate the revised schedule to all the stakeholders.

We sincerely hope that the Hon'ble Commission will consider this request favourably and provide sufficient opportunity to all affected stakeholders to put forth their views before the Hon'ble Commission on this important policy matter.

Yours faithfully


(GANAPATHI.V.S.R.K)
General Secretary.

Copy submitted to the Special Chief Secretary to the Government, Energy Department, Government of Andhra Pradesh.

Copy submitted to All the Chairman and Managing Directors, APEPDCL., APCPDCL., APSPDCL.,
Copy to the Managing Director, Andhra Pradesh Rural Agriculture Power Limited