#  Comments on the draft amendments to Distribution Code 8, dated ../../ 2014

## Regulation 27, Sub Regulation 14:

We request that the requirement of permanent physical segregation may not be insisted on. There are many LT industrial and commercial consumers operate from the same premises and door numbers . They are always on rental basis in such premises. The owner of the building may not be able or willing to make the physical segregation. As long as the consumers are on the same tariff, there is no risk of loss to the Licensee. Therefore, the Regulation may specify that more than one service connection in more than one tariff category would not be given if there is no physical segregation.

## Regulation 31 Sub Regulation 3:

If there is a force majeure condition, the time period for availing the supply may be extended by the Licensee at its discretion. Strikes, prolonged Restriction and Control measures in force may delay availing of the supply.

## Regulation 37:

### Sub Regulation 1:

1. The loading and transport charges in (ii), (iv), (v) and (vi) are excessive. They should be reduced to half of the percentages proposed.

The consumer should be given the opportunity of doing the loading and transport himself, if he so chooses.

1. If the consumer is paying for the new materials, he should be given the option of taking the replaced materials free of cost.
2. Item (VII) (a): The percentage should be increased to at least 80% of the present value. The Licensee will use the material and claim full present value from the next consumer. Therefore, paying a higher amount is no loss to the Licensee and is fair to the consumer who had paid for its replacement.
3. The consumer should be given the option of retaining the materials which the Licensee deems as not reusable. If the consumer is not opting for this, the Licensee should pay the price he got in the last scrap disposal of the item.

### Sub Regulation 2:

The period for refund should be made as one month from completing the work. Pending which, the refund amount should bear the interest at the same rate as the consumer’s security deposit. The period of three months for refunding the excess amount, that too, without any time limit for preparing the revised estimate is unfair to the consumer and would lead to delay, harassment and corruption.

## Regulation 51, Sub Regulation 1 and 2:

1. We strongly object to the composition of the Code Review Panel.
2. It has 7 representatives of the Licensee and only 4 representatives of the consumers. We request that consumer representatives should be at least equal in number to the representatives of the Licensee.
3. Further, we object to the appointment of a representative of the Licensee as the Chair Person and another as the Secretary. We request that the Chair Person should be a member of TNERC or its nominee who is an expert in the field of electricity distribution and who has not been in the employment of the Licensee. The Secretary should be a nominee of TNERC.
4. We request that the representation may be provided to the LT Commercial and Industrial Consumers.
5. We request that the representation given to HT/EHT consumers be increased to two, considering their share in the total power consumption, share of their payment to the revenues of the Licensee and the complexity of the regulations governing their supply.
6. The nominations from the consumers should be made by TNERC from the associations of the consumers. The nominations should be made after assessing their genuineness and representativeness. The Licensee should not be allowed to pick and choose the nominees from those amenable to it.
7. The Panel should meet with at least 15 days advance notice with the agenda papers circulated with the notice.
8. Travelling and Boarding allowances may be given to the representatives of the domestic and agricultural consumers.
9. The names, organisations represented by them, contact particulars of the consumer nominees should be made available in the Web Sites of TNERC and the Licensee.