# Comments on amendments to Supply Code 7, dated ../../ 2014

## In Regulation 4, Sub Regulation 2, Item V:

Additional security deposit should not be included. It is not a charge. It is a refundable deposit. The other items are all expenses. It is not correct to include this item in this.

## In Regulation 5: Sub Regulation 6:

### Clause (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.

### Clause (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.

## In Regulation 7:

We welcome the amendment to Regulation 7(2). A penalty may be specified for non compliance with this regulation as in other regulations.

## In Regulation 15:

It may be specified that payment by Credit Card/Debit Card/Internet Transfer /Mobile Payment , etc., would be deemed as payment by Cash. Payment by actual cash in cash counters of the Licensee should be discouraged by levying a service charge of at least Rs 20. Payment in advance of the last date of payment may be incentivised.

## Regulation 27:

### Sub Regulation 1:

### 

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 names, organisations represented by them, contact particulars of the consumer nominees should be made available in the Web Sites of TNERC and the Licensee.

### Sub Regulation 2:

1. The Panel should meet with at least 15 days advance notice with the agenda papers circulated with the notice.
2. Travelling and Boarding allowances may be given to the representatives of the domestic and agricultural consumers.