A study on enhancing consumer participation in electricity regulatory decision making

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By
Jeya Kumar R,
Researcher - Consumer Protection

Abstract

This study attempts to capture consumers' perspectives on their electricity issues and their own suggestions to solve these by framing/revising regulatory provisions for the same. Relevant electricity regulations in Tamil Nadu were mapped in line with issues highlighted by consumers and checked for gaps, if any. Further, new regulatory provisions are proposed as a means to bridging identified gaps. In summary, our findings suggest that there is adequate scope to pursue revisions in the regulations based on consumers' perspectives.

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1. Introduction

*"Providing avenues for enabling **consumers' voice in the regulatory process** expands the information base available to regulators in their decision making, and is critical for ensuring sustainability of policy and regulatory decisions."*

-World Bank Group, 2015

Consumer participation is necessary to enable representation of public interests on the one hand and to ensure social acceptance of regulatory decisions, on the other. Enabling consumer participation in regulatory decision making will improve governance, enhance accountability, and promote efficiency in delivery of services[1]. In order to promote effective consumer participation, there is a strong need for regulators to take cognisance of consumer interests and incorporate consumers' perspectives while framing/revising electricity regulations.

In India, the Electricity Act 2003 requires the regulatory commissions to conduct public consultations and hearings on important matters to obtain consumer views[2]. So far, regulations were framed/revised by expert groups and then opened for input from citizen consumers. This study attempts to consider the consumer's perspectives on a particular matter, prior to framing/revising of a regulation.

The objective of this study is to explore the role of potential space for consumer participation in framing/ revising electricity regulations. This study focuses on understanding consumer perspectives around their electricity related issues in line with existing regulatory provisions in Tamil Nadu. It further identifies regulatory gaps in the state's electricity sector, draws comparisons with regulations in other states for similar issues, and in-turn develops recommendations to bridge the identified gaps. Overall, the study promotes effective mechanisms to obtain and record consumers' perspectives in the regulatory decision making process.

[1] Transforming Electricity Governance in India Has India's Power Sector Regulation Enabled Consumers' Power?
[2] The Electricity Act, 2003

2. Methodology

Approach and method: The study adopted a qualitative method to understand electricity consumers' perception through focus group discussions (FGDs). A semi-structured questionnaire was used for the discussions, which were held in both English and Tamil. Participants were identified through convenience sampling with the support of the Electricity Consumer Cells (ECCs)[3], an initiative of Citizen consumer and civic Action Group (CAG) functioning in seven districts of Tamil Nadu. Given the sampling design, the study findings are not statistically representative of all consumers.

Data collection: The FGDs were conducted during October 2019 in seven districts of Tamil Nadu including Cuddalore, Salem, Tiruchirappalli, Tirunelveli, Tiruvallur, Tiruvannamalai, and Vellore.

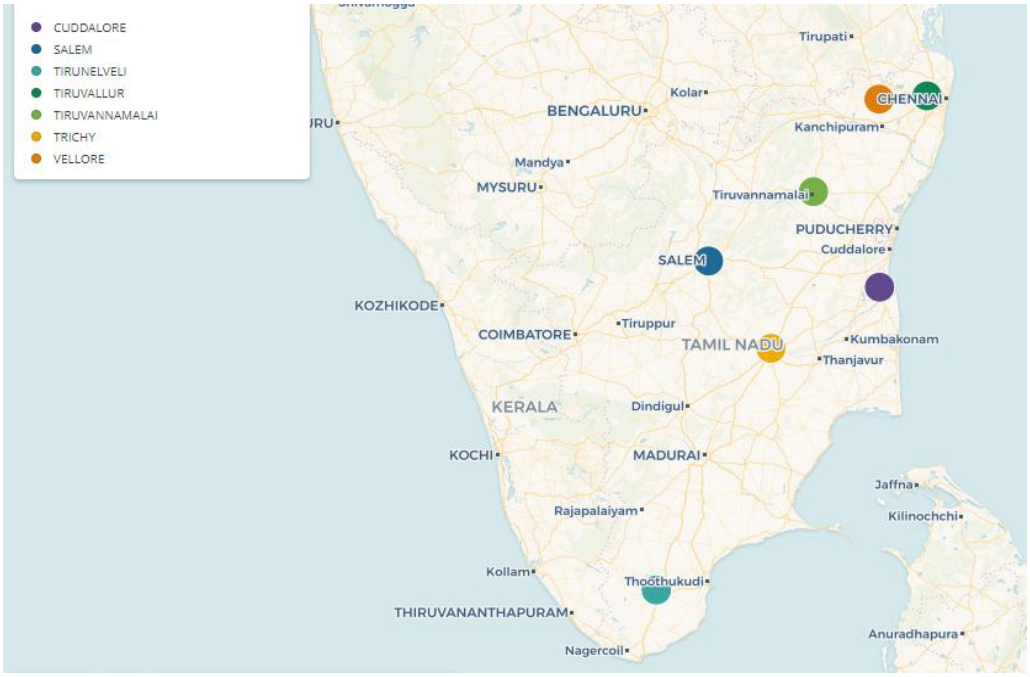

Image 1: Surveyed districts in Tamil Nadu

The study includes FGDs with 175 electricity consumers and each FGD witnessed participation from 25 to 30 consumers. The participants were from diverse backgrounds and different consumer categories. Farmers, retired officials, small-scale businessmen, housewives, masons, electricians and allied construction workers were prominent, among others.

[3] Electricity Consumer Cells (ECCs)

The objective of this study was explained to participants at the beginning of each FGD. Participants were asked a set of open-ended questions to receive in-depth responses about their electricity issues. Open-ended questions often elicit more honest responses from participants[4]. Participants actively discussed their concerns related to electricity supply and all of these were mapped and analysed.

Image 2: Some of the photographs from the Focus Group Discussions (FGDs)

Study framework: A qualitative analysis was carried out at three broad levels:

1. ***Consumer perception*** around electricity issues faced by them: Various concerns raised by consumers were captured and mapped in line with existing regulations.
2. ***Existing regulations*** pertaining to concerns flagged by consumers: Tamil Nadu's electricity regulations that are relevant to concerns raised by consumers were reviewed and regulatory gaps, if any, were identified.
3. ***Other state regulations*** pertaining to concerns flagged by consumers: Corresponding regulations of few other states were reviewed and compared against existing regulations in Tamil Nadu. The states considered for comparison include Karnataka, Andhra Pradesh, Telangana, and Uttarakhand.

[4] Maximizing Qualitative Responses about Smoking in Structured Interviews

3. Discussion and Findings

Following are the major concerns raised by consumers around electricity issues that are either not regulated or, are identified to have regulatory gaps:

- Difficulties in identifying the infrastructure and its location while filing a complaint related to infrastructure.
- Frequent interruptions due to multiple service connections from a single electric pole.
- Difficulties in receiving compensation for electrocution.
- Issues with infrastructure (e.g. transformers, distribution lines, electric poles) crossing through free lands allocated to people through government schemes (e.g. panchami lands).
- Denial of consumer complaints by officials and not acknowledging consumer complaints.
- Furnishing of fake / fraudulent documents by a consumer

Some other issues raised by consumers could be attributed to administrative gaps and hence have not been explored as part of this study which focuses solely on regulatory gaps. Examples include a) manual error in billing by licensee's staff and difficulties in receiving extra paid money or adjustment with subsequent billing cycle, b) delay in reading the meter by licensee's staffs, c) difficulties in obtaining service connection for public facilities (e.g. temples), and d) difficulties in replacing faulty meters

3.1. Difficulties in identifying infrastructure and its location while filing a complaint related to infrastructure

One of the most common concerns raised by consumers was the lack of accurate identification number/information on infrastructure such as transformers, distribution lines, and electric poles. Several consumers highlighted this as a hindrance while filing a complaint related to default/issues with infrastructure.

> *"I once noticed that an electricity pole was about to collapse in the vicinity of my agricultural land. But, there was no way for me to identify and reference the pole in my complaint to the EB office"*
>
> - A farmer, Tiruchirappalli

> *"Power lines were sagging in my area. I was not able to identify the points of support (i.e. electric poles) as the markings on the poles were not legible."*
>
> - A small-scale businessman, Vellore

One participant raised an issue of frequent power interruptions in their locality due to the condition of the distribution transformer. Following each complaint, the utility would temporarily fix the problem, only for it to recur. The participant reported that the problem could be attributed to an obsolete distribution transformer but they had no way of checking it. Similar issues were raised by other participants too.

It was therefore established at the focus group that some electricity infrastructure (e.g. electric poles, transformers, etc.,) have no identification marks or, these were not legible. This prevents accurate communication between the two parties, burdening both the consumer and the utility.

3.1.1. Consumer perception

Consumers suggested that the government make an effort to ensure accurate, legible naming of all infrastructure, along with a system for monitoring this. A robust system like this will also help the utility to identify outdated equipment and infrastructure.

3.1.2. Existing regulation

Tamil Nadu Electricity Distribution Code[5], Chapter 4, 10. Operational labelling

The Licensee and the consumers shall be responsible for the provision and maintenance of clear, unambiguous signs and labels indicating the numbering and / or name of the equipment / apparatus and circuit at the substations and connection sites.

3.1.3. Comparison with other state regulations

Uttarakhand Electricity Regulatory Commission (Distribution code) Regulations, 2018[6], Chapter 4, 4.4. Operational labelling

(1) The Licensee and the consumers shall be responsible for the provision and maintenance of clear, unambiguous signs and labels indicating the numbering and / or name of the equipment / apparatus and circuit at the substations and connection sites.

(2) The equipment installed shall conform to its relevant I.S. specification and the ratings and salient specification shall be maintained on the equipment's nameplate. No electrical equipment shall be used without its manufacturer's nameplate permanently affixed to it.

[5] Tamil Nadu Electricity Distribution Code

[6] Uttarakhand Electricity Regulatory Commision (Distribution code) Regulations, 2018

3.1.4. Suggested provision

In addition to existing regulations, the following could be added: *"The equipment installed shall conform to its relevant I.S. specification and the ratings and salient specification shall be maintained on the equipment's nameplate. No electrical equipment shall be used without its manufacturer's nameplate permanently affixed to it. The Licensee must have a monitoring mechanism to ensure that the labelling is clear and legible. Labelling needs to be redone in case of not clear over a period of time or due to any damage."*

Existing provision	Suggested provision
Tamil Nadu Electricity Distribution Code Chapter 4 *10. Operational Labeling* The Licensee and the consumers shall be responsible for the provision and maintenance of clear, unambiguous signs and labels indicating the numbering and / or name of the equipment / apparatus and circuit at the substations and connection sites.	**Tamil Nadu Electricity Distribution Code Chapter 4** *10.Operational labeling* (1) The licensee and the consumers shall be responsible for the provision and maintenance of clear, unambiguous signs and labels indicating the numbering and / or name of the equipment / apparatus and circuit at the substations and connection sites. ***(2) The equipment installed shall conform to its relevant I.S. specification and the ratings and salient specification shall be maintained on the equipment's nameplate. No electrical equipment shall be used without its manufacturer's nameplate permanently affixed to it.*** ***(3) The Licensee must have a monitoring mechanism to ensure that the labelling is clear and legible. Labelling needs to be routinely redone to maintain legibility, or following reports of damage.***

In addition, a provision for digital information systems (GIS/GPS) for monitoring can be added.

3.1. i. Existing provision

There is currently no specific provision for a digital information system.

3.1. ii. Comparison with other state regulations

Karnataka Electricity Distribution Code (KEDC) 2015[7], Section 3, 3.6.7.

3.6.7. The digital maps of distribution network shall be developed for each of the following preferably by conducting GPS survey which is easier, fast, accurate and economical:

a) 33 kV network of complete distribution system indicating distance, type and size of conductor /size of U.G cable with single core or 3-core for lines and substation particulars with Single Line Diagram (SLD).

b) The feeder-wise 11 kV lines/cables indicating the distance, type and size of conductor /U.G cable, location and capacity of DTCs.

c) The DTC wise L.T .line /cables with number of Consumers and connected load on each of L.T. support / L.T. feeder pillar Box.

Uttarakhand Electricity Regulatory Commission (Distribution code) Regulations, 2018[8]

5.21. Geographical Information System (GIS)/Global Positioning System (GPS) based information system

1) The Distribution Licensee shall, in stages, deploy GIS/GPS based Geographical Facilities Information System for planning operation and maintenance of distribution system. The GIS shall be utilised for mapping the all important elements of the distribution system which includes lines, transformers, sub-stations, generating stations, all unit locations and shall eventually cover all consumers. The GIS shall be linked to an active Relational Database Management System (RDBMS) and GPS shall be utilised for time synchronisation.

(2) The digital maps of distribution network shall be developed for each of the following preferably by conducting GPS survey which is easier, fast, accurate and economical

(a) 33 kV network of complete distribution system indicating distance, type and size of conductor/size of UnderGround (UG) cable with single core or 3 core for lines and substation particulars with Single Line Diagram (SLD).

(b) The feeder-wise 11 kV lines/cables indicating distance, type and size of conductor/ UG cable, location and capacity of distribution transformers.

(c) The distribution transformer-wise LT line/cables with a number of consumers and connected load of each of LT support/LT feeder pillar Box.

[7] Karnataka Electricity Distribution Code (KEDC) 2015

[8] Uttarakhand Electricity Regulatory Commision (Distribution code) Regulations, 2018

3.1. iii. Suggested provision

A new provision in Chapter 5 of Tamil Nadu Electricity Distribution Code can be added as follows.

Geographical Information System (GIS) / Global Positioning System (GPS) based information system

1) The Distribution Licensee shall, in stages, deploy GIS/GPS based Geographical Facilities Information System for planning operation and maintenance of distribution system. The GIS shall be utilised for mapping all important elements of the distribution system which includes lines, transformers, sub-stations, generating stations, all unit locations and shall eventually cover all consumers. The GIS shall be linked to an active Relational Database Management System (RDBMS) and GPS shall be utilised for time synchronisation.

(2) Digital maps of the distribution network shall be developed for each of the following, preferably by conducting GPS survey which is easier, fast, accurate and economical

(a) 33 kV network of complete distribution system indicating distance, type and size of conductor/size of UnderGround (UG) cable with single core or 3 core for lines and substation particulars with Single Line Diagram (SLD).

(b) The feeder-wise 11 kV lines/cables indicating distance, type and size of conductor/ UG cable, location and capacity of distribution transformers.

(c) The distribution transformer-wise LT line/cables with a number of consumers and connected load of each of LT support/LT feeder pillar Box.

Existing provision	Suggested provision
Tamil Nadu Electricity Distribution Code Not available	**Tamil Nadu Electricity Distribution Code** **Chapter 5** **Geographical Information System (GIS)/Global Positioning System (GPS) based information system** ***1) The Distribution Licensee shall, in stages, deploy GIS/GPS based Geographical Facilities Information System for planning operation and maintenance of distribution system. The GIS shall be utilised for mapping all important elements of the distribution system which includes lines, transformers, sub-stations, generating stations, all unit locations and shall eventually cover all consumers. The GIS shall be linked to an active Relational Database Management System (RDBMS) and GPS shall be utilised for time synchronisation.*** ***(2) The digital maps of distribution network shall be developed for each of the following preferably by conducting GPS survey which is easier, fast, accurate and economical*** ***(a) 33 kV network of complete distribution system indicating distance, type and size of conductor/size of UnderGround (UG) cable with single core or 3 core for lines and substation particulars with Single Line Diagram (SLD).*** ***(b) The feeder-wise 11 kV lines/cables indicating distance, type and size of conductor/ UG cable, location and capacity of distribution transformers.*** ***(c) The distribution transformer-wise LT line/cables with a number of consumers and connected load of each of LT support/LT feeder pillar Box.***

3.1.5. Justification

The above features will help consumers understand that equipment is being adequately maintained and monitored. A consumer can also easily report faults, mentioning details and location of an infrastructure. This also reflects the quality of equipment used by the distribution company. Repairing and maintenance is easier, as technicians can easily spot the make and year of manufacture of the equipment they are working on. Identifying outdated equipment and infrastructure will be easier within the utility. Adopting advanced technologies like digital information systems will make the work easy for both licensees as well as consumers.

3.2. Frequent interruptions due to multiple service connections from a single electric pole

Lack of infrastructure, enables dangerous practices, where a single point of support i.e. an electric pole is used to supply for multiple service connections. A few consumers highlighted that they were facing frequent interruptions in their homes, only to realise that multiple homes in the area were supplied from the same electric pole and that fixing a fault on one line would disrupt another.

> *"We were facing several frequent power interruptions at our home. Almost every time, it was identified as a minor fault on the service line at the electric pole. EB officials would attend to the complaint, but the disruption would recur. If not mine, another in the same row. We found out that eight homes were supplied from the same electric pole. Such inconveniences can be easily avoided with better infrastructure. Why do I have to face these interruptions for a rookie mistake?"*
>
> - *A homemaker, Tiruchirappalli*

3.2.1. Consumer perception

Consumers opined that the maximum number of service connections that can be supplied from a single electric pole should be defined. It was highlighted that this will reduce power interruption, leaving technical staff to work on other areas of need. More importantly, it's safer for those in the neighbourhood.

3.2.2. Existing provision

There is no specific provision existing for this issue.

3.3.3. Comparison with other state regulations

None of the states considered have addressed this issue

3.3.4. Suggested provision

As per Section 71 (service lines from overhead lines) of Central Electricity Authority (Measures relating to safety and electricity supply) Regulations, 2010[9], a provision on "Service lines from overhead lines" can be included in Tamil Nadu Electricity Distribution Code saying "*No service line of tapping shall be taken off an overhead line except at a point of support. Provided that the number of tappings per conductor shall not be more than four in case of connections at voltages not exceeding 650 V".*

Existing provision	Suggested provision
Tamil Nadu Electricity Distribution Code Not available	**Tamil Nadu Electricity Distribution Code** **Service lines from overhead lines** ***No service line of tapping shall be taken off an overhead line except at a point of support. Provided that the number of tappings per conductor shall not be more than 4 in case of connections at voltages not exceeding 650 V.***

3.2.5. Justification

Consumers can receive uninterrupted electricity services. This will also help the utility to provide a safer service to the consumer, minimising damage and faults to the distribution infrastructure.

[9] Measures relating to safety and electricity supply regulations, 2010

3.3. Issues with infrastructure (e.g. transformers, distribution lines, electric poles) crossing through free lands allocated to people through government schemes

Another issue around infrastructure was brought to light during one of the FGDs. It was highlighted that there are cases where electricity distribution lines cross through free lands allocated through government schemes. In such cases it is said that the burden of shifting charges falls on the underprivileged citizen who received the free land.

> "There is this electricity distribution line that passes through my housing plot. The plot was given to me for free by the government, considering my social conditions. When I requested the EB officers to move the line, I was asked to pay for the cost of the work. Given my economic condition, I cannot afford this. How is this fair? It's not just me, I know many others facing similar difficulties"
>
> - A daily wage labourer, Tiruchirappalli

3.3.1. Consumer's view

It is unfair and unrealistic to offer free land which is burdened with other difficulties that can only be solved by money. The consumers requested that the government must bear these charges.

3.3.2. Existing provision

There is no specific provision existing for this issue.

3.3.3. Comparison with other state regulations

None of the states considered have addressed this issue

3.3.4. Suggested provision

A new provision in Tamil Nadu Electricity Supply Code[10] in Chapter 2, 5. Miscellaneous charges, (6) Service / Line shifting and equipments shifting charge saying "(4) *Shifting charges shall not be applicable for infrastructures such as lines, structure, equipments, etc., crossing through lands that are freely provided by government schemes (e.g. Panchami land).*

[10] Tamil Nadu Electricity Supply Code

Existing provision	Suggested provision
Tamil Nadu Electricity Supply Code Not available	**Tamil Nadu Electricity Supply Code** **Chapter 2,** **5. Miscellaneous charges** **(6) Service / Line shifting and equipments shifting charge** (1) xxxxx (2) xxxxx (3) xxxxx **(4)** ***Shifting charges shall not be applicable for infrastructures such as lines, structure, equipments, etc., crossing through lands that are freely provided by government schemes (e.g. Panchami land).***

3.3.5. Justification

Government schemes provide free lands to people who cannot afford to buy their own land. In such cases, it is unjust to demand shifting charges from these beneficiaries. Thus charges for shifting of electricity infrastructure should be rendered by the concerned government bodies, before allocating the lands to people.

3.4. Difficulties in receiving compensation for electrocution

A social activist who participated in a meeting raised an issue about compensation for victims of electrocution. He highlighted that there is no clarification about i) who will provide compensation to the victims, whether the utility or state government ii) the amount of compensation iii) procedure to claim compensation and iv) time limit for providing compensation to the victims. Due to these obfuscations, the process was not always smooth and timely.

3.4.1. Consumer perception

The government should define the procedure to receive compensation for electrocution. Amount of compensation to be paid has to be defined. Also guidelines must be provided for appeals if the defined compensation is not received by the victim.

3.4.2. Existing provision / regulation

There is no specific provision / regulation existing for this issue.

3.4.3. Comparison with other state regulations

Andhra Pradesh Electricity Regulatory Commission has a separate regulation for this namely "Compensation to victims of electrical accident regulations, 2017"[11]

3.4.4. Suggested regulation

Section 161 (notice of accidents and injuries) of the Electricity Act, 2003 says, *if any accident occurs in connection with the generation, transmission, distribution, supply or use of electricity in or in connection with, any part of the electric lines or electrical plant of any person and the accident results or is likely to have resulted in loss of human or animal life or in any injury to a human being or an animal, such person shall give notice of the occurrence and of any such loss or injury actually caused by the accident, in such form and within such time as may be prescribed, to the Electrical Inspector or such other person as aforesaid and to such other authorities as the Appropriate Government may by general or special order, direct.*

But, no provision was made for payment of any compensation to any person affected;

Whereas Section 53 (Provisions relating to safety and electricity supply) of the Electricity Act, 2003 says *The Authority may in consultation with the State Government, specify suitable measures for –*
(a) protecting the public (including the persons engaged in the generation, transmission or distribution or trading) from dangers arising from the generation, transmission or distribution or trading of electricity, or use of electricity supplied or installation, maintenance or use of any electric line or electrical plant;

[11] Andhra Pradesh Electricity Regulatory Commision Compensation to victims of electrical accident regulations, 2017

(b) eliminating or reducing the risks of personal injury to any person, or damage to property of any person or interference with use of such property ;

Whereas Section 57 (Consumer Protection: Standards of performance of licensee) says *(1) The Appropriate Commission may, after consultation with the licensees and persons likely to be affected, specify standards of performance of a licensee or a class of licensees.*

Whereas Section 181 (Powers of State Commissions to make regulations) says *(1) The State Commissions may, by notification, make regulations consistent with this Act and the rules generally to carry out the provisions of this Act.*

Therefore, with the power conferred to the state commissions on Section 57 and 181 of the Electricity Act, 2003 and reading together the above mentioned Sections of the Act, The Tamil Nadu Electricity Regulatory Commission can make a new regulation / provision on 'Compensation to victims of electrical accidents' that should be clearly explain a)the definition for electricity accidents, b)details of the concerned government body responsible to pay compensation and procedure c)stipulated time for processing the compensation and d)amount of compensation to be paid based on the intensity of the accident e) procedure to claim, in case of not receiving the compensation

Existing regulation	**Suggested regulation**
Not available	**Details to be covered** *a) The definition for electricity accidents* *b) Details of the concerned government body to pay compensation and procedure* *c) Stipulated time for processing the compensation* *d) Amount of compensation based on the intensity of the accident. and* *e) Procedure to claim in case of not received the compensation*

3.4.5. Justification

Adding a new provision / regulation on this issue would help ease the burden on victims of electrocution or their dependents. This citizen friendly and transparent regulation for providing compensation to electrocution victims will reflect the concern of the government on public lives.

3.5. Denial of consumer complaints by officials and not acknowledging consumer complaints

Many consumers raised concerns about officials refusing to formally accept their complaints. It was shared in multiple FGDs that consumer complaints tend to be dealt with informally. This was cited as a cause for concern as such cases would present no proof of complaint, thus making follow-up and appeal a near-impossible task.

> "I complained to EB about frequent power interruptions in my home. The officer I met, refused to receive the complaint. He just orally assured me that it would be looked into. But, that didn't change anything"
>
> - A Teacher, Tirunelveli
>
> "My complaint was regarding voltage fluctuations in my house. I lodged a complaint with this EB official. This issue continued. When I went to the EB office again to complain, I was asked to make a fresh complaint and there was no way to trace the initial complaint. With no proof of complaint, I was not able to argue or appeal on the earlier one.
>
> - A Homemaker,Tiruvallur

3.5.1. Consumer perception

Consumers suggested that they be given some evidence of a complaint being lodged.

3.5.2. Existing provision

Tamil Nadu Electricity Distribution Standards of Performance (DSOP) Regulations, 2004[12], 20. Handling of complaints on non-compliance

ii) A unique number shall be allotted to each complaint and conveyed to the consumer. In case of complaints which are supply related and restoration of supply, authorized persons of Licensee shall prepare an acknowledgment slip in duplicate after attending to the complaint

[12] Tamil Nadu Electricity Distribution Standards of Performance Regulations, 2004

and get the consumer signature. Where the consumer refuses to sign the acknowledgment slip, the fact shall be recorded and a copy handed over to the consumer. As a measure of precaution and proof of having visited the consumer's service location, the Licensee's employee shall also record the meter reading of the respective service and any one of the adjoining service connection in the acknowledgement slip. The designated officer shall entertain any complaints from the consumer for noncompliance, only if the complaint is accompanied with a copy of acknowledgment slip. The Licensee shall ensure redressal of all complaints promptly

3.5.3. Comparison with other state regulations

Andhra Pradesh & Telangana state Electricity Regulatory Commissions has a complaint handling procedure[13], which consists of proforma for lodging complaints with an acknowledgement receipt to be filled by the licensee and handed over to the consumer.

3.5.4. Suggested provision

A point can be added in Tamil Nadu Electricity Distribution Standards of Performance (DSOP) Regulations, 2004[14], 20. Handling of Complaints on Non-compliance, saying *"The Licensee must have a proforma to lodging complaints with an acknowledgement receipt with an unique number to be filled by the licensee's employee and handed over to the consumer. It is mandatory to issue a photocopy of received complaints to the consumers after mentioning the unique number, in case proforma is not available".*

[13] Andhra Pradesh Electricity Regulatory Commision, Complaint handling procedure relating to distribution and retail supply
[14] Tamil Nadu Electricity Distribution Standards of Performance Regulations, 2004

Existing provision	Suggested provision
Tamil Nadu Electricity Distribution Standards of Performance (DSOP) Regulations 20. Handling of Complaints on Non-compliance *ii) A unique number shall be allotted to each complaint and conveyed to the consumer. In case of complaints which are supply related and restoration of supply, authorized persons of Licensee shall prepare an acknowledgment slip in duplicate after attending to the complaint and get the consumer signature. Where the consumer refuses to sign the acknowledgment slip, the fact shall be recorded and a copy handed over to the consumer. As a measure of precaution and proof of having visited the consumer's service location, the Licensee's employee shall also record the meter reading of the respective service and any one of the adjoining service connection in the acknowledgement slip. The designated officer shall entertain any complaints from the consumer for noncompliance, only if the complaint is accompanied with a copy of acknowledgment slip. The Licensee shall ensure redressal of all complaints promptly*	**Tamil Nadu Electricity Distribution Standards of Performance (DSOP) Regulations** 20. Handling of Complaints on Non-compliance **ii) *The Licensee must have a proforma to lodging complaints with an acknowledgement receipt with an unique number to be filled by the licensee's employee and handed over to the consumer and/or an SMS with details of complaint with an unique number can be sent to the consumer. It is mandatory to issue a photocopy of received complaints to the consumers after mentioning the unique number, in case proforma is not available.*** *In case of complaints which are supply related and restoration of supply, authorized persons of Licensee shall prepare an acknowledgment slip in duplicate after attending to the complaint and get the consumer signature. Where the consumer refuses to sign the acknowledgment slip, the fact shall be recorded and a copy handed over to the consumer. As a measure of precaution and proof of having visited the consumer's service location, the Licensee's employee shall also record the meter reading of the respective service and any one of the adjoining service connection in the acknowledgement slip. The designated officer shall entertain any complaints from the consumer for noncompliance, only if the complaint is accompanied with a copy of acknowledgment slip. The Licensee shall ensure redressal of all complaints promptly*

3.5.5. Justification

DSOP, 20. (ii) is mandating an acknowledgement from consumers, that a complaint has been attended to. Likewise, an acknowledgement for complaints also can be mandated. This will help consumers to get better service and will enhance the transparency of the licensee in handling consumer complaints.

3.6. Furnishing of fake / fraudulent documents by a consumer

In one of the FGDs, the issue of consumers submitting fake / fraudulent documents or information to obtain connections was discussed at length. In addition to the regulatory angle, the need to uphold basic consumer responsibility was emphasised during the discussion.

> *"I'll tell you about the major concern that most people seem to miss. I am not sure if there is a regulation against it. If not, I am all the more justified in claiming this a major concern. I know that there is this practice where consumers submit fake or fraudulent documents while obtaining connections. Shouldn't the regulations prohibit that?"*
>
> - *A retired government official, Salem*

3.6.1. Consumer perception

Illegal activities by the consumers must be prohibited. A provision ensuring legal actions against the consumer who furnishes fake / fraudulent documents must be included in the regulations.

3.6.2. Existing provision

There is no provision existing for this issue

3.6.3. Comparison with other state regulations

Karnataka Electricity Regulatory Commission Supply (Code), 2004[15]

43.00 FURNISHING OF FAKE / FRAUDULENT DOCUMENTS BY THE CONSUMER

If power supply is availed by the Consumer on the basis of fake / fraudulent documents, the Licensee reserves the right to disconnect the installation forthwith and to forfeit the deposits, without prejudice to the recovery of dues, if any.

[15] Karnataka Electricity Regulatory Commission Supply (Code), 2004

3.6.4. Suggested provision

A provision can be added in Tamil Nadu Electricity Supply Code, 2004 as follows

FURNISHING OF FAKE / FRAUDULENT DOCUMENTS BY THE CONSUMER

If power supply is availed by the Consumer on the basis of fake / fraudulent documents, the Licensee reserves the right to disconnect the installation forthwith and to forfeit the deposits, without prejudice to the recovery of dues, if any. The consumer furnishing / fraudulent documents, should obey any further legal actions taken by the licensee.

Existing provision	Suggested provision
Tamil Nadu Electricity Supply Code Not available	**Tamil Nadu Electricity Supply Code** **FURNISHING OF FAKE / FRAUDULENT DOCUMENTS BY THE CONSUMER** ***If power supply is availed by the Consumer on the basis of fake / fraudulent documents, the Licensee reserves the right to disconnect the installation forthwith and to forfeit the deposits, without prejudice to the recovery of dues, if any.***

3.6.5. Justification

This will help to avoid illegal usage of electricity by any person or organisation. There are still people who do not have access to electricity because of some barriers including illegal usage of electricity. Adding this provision will somewhat mitigate this problem. This will safeguard the utility infrastructure and avoid unwanted revenue losses to the utility.

4. Conclusion

The main objective of this study was to explore the potential of a space to gather consumers' perspectives in framing and revising electricity regulations. In the FGDs conducted around the need to identify regulatory gaps in the sector, consumers discussed their concerns, and provided opinions on possible solutions. These discussions provided consumers with an avenue to highlight their concerns and present their needs in line with the regulatory provisions. The study found that the consumers were not only concerned about their own issues, but also about the betterment of the utility. A comparative analysis with the other states' regulations for similar kinds of issues, helped provide concrete recommendations for strengthening the regulations in Tamil Nadu. Further, findings suggest that there is adequate scope in pursuing revisions in the regulations based on consumer perception of electricity issues.

Overall, there is merit in developing a formal and regular practice of seeking consumer inputs while framing/revising electricity regulations. Therefore, the study recommends obtaining and recording consumers' perspectives through consumer focused meetings. In addition to capturing consumers' perspectives, such meetings can (i) enhance consumer participation in electricity regulatory decision making, (ii) improve the utility's understanding of consumer views and concerns, (iii) increase accountability among the utilities and in turn (iv) ensure protection of consumer interests.