

**BEFORE HON'BLE JOINT ELECTRICITY REGULATORY COMMISSION
FOR THE STATE OF GOA & UNION TERRITORIES
GURGAON, HARYANA.**

File No. _____
Case No. _____

IN THE MATTER OF :

Petition No. 129/2014 – Orders for implementation of detailed study on Manpower Requirement of Chandigarh Electricity Department conducted by M/S Deloitte Touche Tohmatsu India Pvt. Ltd.

And in the matter of

Electricity Department – Chandigarh.

**APPLICATION ON BEHALF OF OBJECTOR FOR
REVIEW OF ORDERS DATED 24.06.2014 PASSED BY
HON'BLE JOINT ELECTRICITY REGULATORY
COMMISSION.**

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(GOPAL DATT JOSHI)
Petitioner
General Secretary
U.T. Powermen, Chandigarh

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RESPECTFULLY SHOWETH:-

1. That the Hon'ble JERC while disposing of the petition No. 29/2014 recommended the certain numbers of posts of various categories, but it is pertinent to mention here that there are already 1780 sanctioned posts of various categories are existing in the U.T. Electricity Department since 1987, and budgetary provision for the same has also been granted by the Govt. Of India and allocated by the Engineering Department U.T., Chandigarh as has been allocated to other circles of the Engineering department thus the disposed of the petition without proper facts on record and without examining the matter in its proper prospective and lacks material detail thus the decision need to review in this prospect i.e. as per already sanctioned posts. (The copy of the sanctioned posts as well as filled up posts is attached as **Annexure –I**).

2. That Hon'ble JERC while disposing off Petition No. 129/2014 has recommended certain no. of posts of various categories but there is no mention to the staffing norms of PSEB now PSPCL which were attached in the objection partition, as well as manpower study already conducted and approved by Staff Inspection Unit constituted by Govt. of India in the year 2001 vide which 90 No. of additional posts of various categories were sanctioned in addition to the existing sanctioned strength of 1780 Nos. (Copy summary report of SIU is attached as **Annexure-II**). Therefore, the decision dated 24.06.2014 should be reviewed in terms of the already sanctioned strength by incorporating 90 Nos. additional posts, as well as in terms of PSEB (Staffing Norms). Therefore, the budgetary sanction should be accorded based on complete strength i.e. already sanctioned + 90 No. additional posts.
3. That the Electricity Department in its original petition filed by the Chief Engineer in Para-I admitted that Chandigarh Electricity Department (CED) has been functioning as an integrated utility for performing Distribution and Transmission licensee activities in the area Chandigarh U.T. but while submitting the reply of the objection raised by the U.T. Powermen Union SE Electricity para-I pointed out that Petitioner the Chandigarh Electricity Department (CED) has been allowed to function as an integrated distribution licensee for the licence of area of Chandigarh U.T. thus the organized petition & reply petition are contratory accordingly. **ON THE SAME LINE** the manpower study conducted by M/s Deloitte

Touche Tohmatsu India Pvt. Ltd. is based only for one segment of the department i.e. **Distribution System** leaving behind the important aspect of **Transmission and Generation System** for which a strength to the tune the complete separate circles headed by Chief Engineer alongwith other officers and subordinate staff particularly SSE, JE (Sub/Station), SSA Lineman ALM, LDC, UDC etc. required on additional basis. It is pertinent to mention that U.T. Electricity Department, Chandigarh is handling the affairs of EHV transmission lines upto 220 KV rated capacity from 4 Nos. resources situated in different states i.e. Nalagarh (HP), BBMB & Dhulkot, Hry. and Punjab State Electricity Board which has further networking of **large no. of Grid Sub Stations of 220 KV / 66 KV capacities** located at various positions in the Union Territory of Chandigarh and catering to the electricity supply. If the strength of staff is worked out based on the quantum of work covered under EHV Transmission System then one complete circle headed by separate Chief Engineer will be highly justified beside the study conducted by M/s Deloitte Touche Tohmatsu India Pvt. Ltd. for smooth functioning of the Electricity Department of U.T. Chandigarh. The Electricity Department is also heading towards the **Generation** through renewable sources i.e. Solar System etc. etc. for which the exercise had already taken a kick start and more staff is required for examining and preparing proposals to strengthen the aforesaid system. The Generation through Solar System is becoming more and more popular in the coming times as the same is

abundantly available and that too without any cost, thus, the power supply will be available at much cheaper rates in the near future. Therefore it is submitted that the complete circles of Transmission & Generation headed by separate Chief Engineer be created and according the post of other subordinate staff for the same also be approved.

4. That the Hon'ble Commission while disposing off the writ petition has erred by drastically decreasing the strength of staff at the entry level i.e. Assistant Lineman, Lineman & many more other categories and has preferred to outsource these activities from the open market. In this regard it is respectfully submitted that the services required towards maintenance of power system involves safety of self, safety of public and safety of costly equipments, which necessitates to recruit trained staff at entry level i.e. ALM/LM/Foreman which may not be readily available in the market. It is specific to mention that the line staff viz a viz ALM & Lineman whose services are extended towards the power lines / power system are of very much careful and meticulous nature and is discharged by the expert staff who had already undergone rigorous training at the entry point as elaborated in the following manner :-

Entry level →ALM→ LM → SSA → F/Man → J.E.
(Span of 15 to 20 years)

Such type of officials cannot be made available from the market but has to be trained in the department being one of the most monopolized and having big infrastructure. In fact, if technical staff is engaged through outsourcing it will not be qualitatively worth and

safe for proper operation and safety of general public. In view of the narrated facts it is at this stage utmost urgent to review the decision earlier taken by the Hon'ble Commission and open the doors for sanctioning of more staff at entry levels. The Hon'ble Commission will appreciate that if somehow the activities are outsourced and staff is provided with rigorous technical training, there is always the tendency of the contractual staff to run away in case getting any opportunity outside the domain of department due to job insecurity in the hands of contractor and financial constraints, therefore, the time and money spent by the department will ripe out no fruits. It is also pertinent to mention here that the work of the department is of permanent in nature and Engineering outsource work force in the department is against the principle of natural justice and constitutional provisions more so the M/s Deloitte Touche Tohmatsu India Pvt. Ltd. has no authority to recommend for the appointment of outsource workers . He should specifically recommended the posts strictly as per connections and projects. Recently, the Executive Engineer, Elec. 'OP' Divn. No. 3 has strived it very hard to hire the staff on contract to cop-up with the strength of shortage of staff but despite repetitive tenders and followed by corrigendum none from the market could file their bid which establishes and substantiate that such type of activities cannot be outsourced being technically not feasible from open market. (**Annexure A-2**). Therefore it is respectfully prayed that department the advise to appoint out source work force on regular basis, particularly where risk is involve.

5. The strength of staff worked out by M/s M/s Deloitte Touche Tohmatsu India Pvt. Ltd. seems hypothetical and does not

include the view suggested by the U.T. Powermen Union vide which it was specifically emphasized upon the study already carried out towards working out the strength of staff by the **Staff Inspection Unit** constituted by Govt. of India to look into the affairs and functioning of Electricity Department effectively. The study carried out by M/s M/s Deloitte Touche Tohmatsu India Pvt. Ltd. could not incorporate and has not appreciated the facts already conveyed to the Hon'ble Commission about the benchmark / yardsticks adopted by the State Power Utilities of Haryana & Punjab to ascertain the actual no. of officials required in each category. The below mentioned figures will make it clear enough about the strength of staff existing in the other union territories of Govt. of India against no. of electric connections and the Hon'ble Commission will be compelled to rethink and review the decision earlier taken.

| States | Consumers | Employees | Consumers served by a Employee |
|-------------------|-------------------|------------------|---------------------------------------|
| Goa | 600,000.00 | 5,497.00 | 109.15 |
| Manipur | 300,000.00 | 3,158.00 | 95.00 |
| Mizoram | 200,000.00 | 1,603.00 | 124.77 |
| Pondicherry | 300,000.00 | 1,837.00 | 163.31 |
| Tripura | 500,000.00 | 4,793.00 | 104.32 |
| Chandigarh | 199,840.00 | 1,092.00 | 183.00 |

Prayer to the Hon'ble Commission

In view of the facts of circumstances narrated here in before, it is respectfully prayed that the Hon'ble commission may kindly review the matter and approve the following : -

- That the Hon'ble Commission is requested to accept this Review Petition, process and approve the same as per expeditiously.

- The Hon'ble Commission is requested to approve the manpower requirement for CED considering all the aspects i.e. distribution, transmission and generation as per already available yard stick of PSEB.
- Condone any inadvertent omissions/errors/shortcomings and permit the Union to add/change/modify/alter this filing and make further submissions as may be required including any delay in filing review petition.
- Pass appropriate orders and appointed in the petition and other orders, as the Hon'ble Commission may deem fit and proper keeping in view the facts and circumstances.

Place : Chandigarh
Dated: 09-08-2014

(GOPAL DUTT JOSHI)
General Secretary
U.T. Powermen Union,
U.T. Chandigarh.

Annexured:-

- i) List of sanctioned posts**
- ii) Summary SIU report**
- iii) DNIT for filling up the posts**
approved by screening committee through outsource