

Tamil Nadu Electricity Board Engineers' Association

(Recognized in G.O. No.854 dated 06-04-1946)

Regn. No.217/94

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Chennai-2,
15.05.2024.

To

The Chairman cum Managing Director,
Tamil Nadu Generation and Distribution Corporation
Ltd,
144, Anna Salai, Chennai - 600 002.

Lr.No. TNEBEA/GS/D.142/2024 dt. 15.05.2024

Respected Sir,

Sub: Abolition of 62 EEs/ Operation & 220 AEs/
Maintenance posts in 230 KV/ 110KV Sub-
Stations - Reconsideration requested - Reg.

Ref: 1. (Per)FB TANGEDCO Proceedings No.4
dt.05.03.2024.

2. மடல் எண்: த.நா.மி.வா.பொ.க/பொ.செ/
அ.126/2024, நாள்: 07.03.2024

3. Lr. No. TNEBEA/GS/D.127/2024 dt.
08.03.2024.

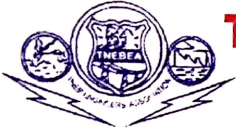
4. Orders dated 30.04.2024 in W.P. No. 12463
of 2024.

Vanakkam.

As directed by the Hon'ble High Court of Madras, vide orders dated 30.04.2024 in W.P. No. 12463 of 2024, this Association respectfully submits the following representation for due appreciation of the facts and circumstances with ulterior interest at the organization as well as our consumers, who are the prime stakeholders of this organization and for considerable rollback of the irrational and unscientific orders passed under (Per) FB TANGEDCO Proceedings No.4 dt.05.03.2024.

2. At the outset, the Association opts to state that we are ever inclined to sit across the table, discuss with the CMD and other officials and find appropriate solutions to all issues that crop up during discharge of our duties. It is disheartening to observe that our sincerity towards this sort of approach is not suitably recognized and rewarded.





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We didn't rush to court as is labeled before representing to the Board & Government. Even on this instant issue, we faithfully chose to adhere to our usual way of representation to the Hon'ble Chief Minister, GOTN, Hon'ble Minister for Electricity and respected CMD. We represented the Government through our letter dt. 07.03.2024, 2nd cited. We represented the CMD through our letter dt.08.03.2024, 3rd cited, where in we sought a copy of the report of the study committee which formed the basis of the above proceedings at an early date so that we may study it and submit our comments. In as much as there is no response, we are forced to file a W.P. before the Hon'ble High Court, having been left with no other option only on 26.04.2024. As directed by the Hon'ble High Court vide orders dated 30.04.2024, we submit the following representation in addition to the points indicated in our letters 3rd cited.

3. Annual recruitment of Assistant Engineers to match with the strength of retiring officers & sanction of new posts in proportion to the growth of this organization and accelerated promotional opportunities to the incumbents on the roll are the two major issues to be redressed on time. We are forced to state that there is no rational approach to both issues.

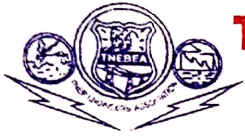
- Vacancies in the post of Assistant Engineers are allowed to get accumulated reaching 1000 out of 6800 sanctioned posts. These prime posts are permitted to be vacant without responsible and regular officer for years together, paving way to many unnecessary hardships like additional charge of vacant posts for years together, unceremonious situation of directing the AEEs to hold full additional charge of the post of AEs, difficulties in getting relief on transfers, susceptible to disciplinary proceedings during the period of additional charge etc. The Board, which is duty bound to fill these vacancies within a reasonable period, has been simply sitting/sleeping over this issue for over 5 years. Our representations to the Board and Government fetched only ZERO effect.
- Many SEBs and GOI undertakings chose to implement Assured Career Progression Program to their employees injecting a sense of motivation. Herein, even vacancy-based promotions in all cadres are intentionally staggered in an ambition of cost cutting.

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The proceedings issued under (Per) FB TANGEDCO Proceedings No.4 dt.05.03.2024 is thus a double-barreled gun firing simultaneously at both targets sought to be achieved.

4. 230KV Sub-Stations are the main source of supply to many intermediate 110KV (G), 110KV (NG)&33KV Sub-Stations, EHT & HT consumers. Development of RE power through wind and solar sources has enhanced their importance since they provide powerful power evacuation channels to reach the load centres. Proper maintenance and operation of 230KV & 110KV Sub-Stations and EHT lines as directed under Code of Technical Instructions alone ensures reliable power stability. The Code of Technical Instructions dictates the schedule of maintenance to be carried out on all electrical apparatus available in the sub-stations at prescribed periodicity viz. hourly, weekly, monthly, quarterly, and annually. It is a fact on record that there is high degree of slippage in respect of periodical maintenance in view of inadequate staff strength, ultimately leading to premature failure of equipment and landing us on unnecessary investment of fund for replacing such failed equipment. The availability of sufficient numbers of designated officers and staff in all sub-stations of varied voltage rating is of utmost importance to cope up with the job of maintenance and monitoring round the clock to ensure uninterrupted distribution of electricity. Even a momentary interruption will cause interruption of supply to lakhs of consumers leading to revenue loss to the tune of many lakhs of rupees.

5. In the past, the Board used to consider sanction of reasonable team of sufficient officers and RWE staff to carry on all activities in the Sub-Stations premises without any default.

(a) Initially, the Board sanctioned the following posts of technical officers for manning 230 KV Sub-Stations vide B.P.Ms. No.1707, dt. 31.12.1977.

(a)	Executive Engineer/ Operation	1 No.
(b)	Assistant Executive Engineer/ Maintenance	1 No.
(c)	Assistant Engineers/ Shift	4 Nos.

(b) Considering the fast load growth and installation of higher capacity auto transformers to handle phenomenal load growth, the Board found fit to revise the team of technical officers for 230KV Sub-Stations as below vide (Per) B.P.(FB) No. 81 (SB) dt 26.12.1996.

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(a)	Executive Engineer/ Operation	1 No.
(b)	Assistant Executive Engineer/ Maintenance	1 No.
(c)	Assistant Engineer/ Maintenance	1 No.
(d)	Assistant Engineers/ Shift	4 Nos.

- (c) During the year 2010, the GOTN resolved to unbundle TNEB into three entities as TNEB Ltd, TANGEDCO Ltd & TANTRANSCO Ltd and they started functioning since 01.11.2010. The Board of TANTRANSCO Ltd resolved in its 29th meeting held on 23.06.2012 and ordered a well-defined organizational structure for the newly formed TANTRANSCO Ltd vide (Per) (FB) TANTRANSCO Proceedings No. 31, dt.10.07.2012. These proceedings suggest the following norms of technical officers for 230KV & 110KV Sub-Stations.

230KV Sub-Stations		
(a)	Executive Engineer/ Operation	1 No.
(b)	Assistant Executive Engineer/ Maintenance	1 No.
(c)	Assistant Engineer/ Maintenance	1 No.
(d)	Assistant Engineers/ Shift	4 Nos.

110KV Sub-Stations (Grid)		
(a)	Assistant Executive Engineer/ Maintenance	1 No.
(b)	Assistant Engineer/ Maintenance	1 No.
(c)	Assistant Engineers/ Shift	4 Nos.

For 2 Nos. 110KV Sub-Stations (Non-Grid)		
(a)	Assistant Executive Engineer/ Maintenance	1 No.
(b)	Assistant Engineer/ Maintenance	2 No.
(c)	Junior Engineers II Grade / Shift	4 Nos.

6. The foregoing paragraph clearly demonstrates that the post of Executive Engineer/ Operation in 230 KV Sub-Station has been in vogue since 1977. It is distressing to note that (Per) FB TANGEDCO Proceedings No.4 dt.05.03.2024 has been issued, ultimately rewriting the B. Ps issued in the year 1977, 1996 & 2012, with alarming minimal strength of officers to manage the vital links of ensuring uninterrupted supply. It is now ordered therein as below:

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- (a) Each Executive Engineer/ Operation must look after all 230 KV Sub-Stations, 110KV Grid & Non-Grid Sub-Stations in the Distribution Circle.
- (b) Each AEE/ Maintenance /230 KV SS must look after 4 Nos. 110 Non-Grid Sub-Stations additionally.
- (c) Each AEE/Maintenance/ 110KV Grid SS must look after 10 Nos. 110 KV Non-Grid Sub-Stations additionally.
- (d) Each AE/Maintenance / 110 KV Non-Grid Sub-Stations must look after 2 (Two) Nos. 110 KV (Non-Grid) Sub-Stations.

7. The table furnished below indicates the phenomenal growth in the power flow network system and emphasizes the continuance of these essential posts without reduction as suggested in the recent proceedings issued on 05.03.2024.

	Details	31.03.1987	31.03.2022	Times
1.	<i>Installed capacity (MW)</i>	3887	33877	8.71
2.	<i>No. of Sub-Stations</i>	475	1836	3.86
3.	<i>EHT & HT Lines (Lakh ckt. Kms)</i>	0.919	2.24	2.43
4.	<i>LT Lines (Lakh Kms)</i>	3.00	6.17	2.05
5.	<i>Distribution Transformers</i>	68,828	3,73,162	5.42
6.	<i>Agricultural Pump-sets (Lakh)</i>	11.16	22.87	2.04
7.	<i>Consumers (Lakhs)</i>	64.86	324.54	5.00
8.	<i>Energy Sales (MU)</i>	11,999	97,465	8.12

In view of steadily increasing load growth, we witnessed a peak of 20,830 MW on 02.05.2024 and peak consumption of 454.320 MU on 30.04.2024.

8. It is unfortunate that the Study Committee has ventured into this unwise exercise suggesting reduction of technical officers as outlined under (a) to (d) of Para (6) with scant regard for the difficulties that are being encountered in the maintenance of Sub-Stations & EHT/HT lines.

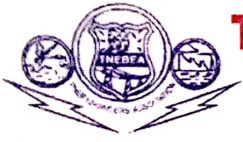
- Sub-Stations are located far away from the village and it is difficult to use public transport to reach the SS premises. Assured facilities for vehicles are not available in many Sub-Stations.
- Distance between two 230 KV Sub-Stations is above 50 kms in areas other than metropolitan cities. Distance between two 110KV Sub-Stations is above 15-20 kms.
- There is only depleted strength of staff in all Sub-Stations and Shift duties are somehow managed by drafting O&M staff.

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- It is already very difficult to manage all maintenance activities as stated in the Code of Technical Instructions.
- It is very difficult for any incumbent to visit all 230 KV & 110KV Sub-Stations in the entire Distribution Circle at least once a month. Except in metropolitan cities, it is not possible in other distribution circles due to long distances between Sub-Stations, lack of adequate vehicle facilities, constraints in using contract vehicles due to ceiling etc.
- Reduction of posts has been suggested by the Study Committee without a full-fledged time and motion study on all issues posing the maintenance of the Sub-Stations and Lines.
- It is safe and secure to carry out the activities in the Sub-Stations only under proper supervision of authorized technical officers; otherwise, there is scope for mal operation, failure of equipment, accidents to personnel on the job.
- An EE/Operation is expected to tackle both normal and emergent situations as below:

9. The Association is duty bound to recall the following features which were conveniently neglected by the Study Committee. Existing posts were sanctioned in the past considering both normal and emergent situations. Only some of them are tabulated below:

(a) Normal:

- All equipment in most of the EHT Sub-Stations have served their life period of 25 years.
- The power handling capacity of the Sub-Stations is much higher in many cases due to the interconnection of import / export feeders, generation feeders from RE sources like solar and wind energy.
- The loading of auto transformers must be monitored continuously round the clock since it is susceptible to vary differently on different seasons/ timings. Only experienced officers in the cadre of EEs/ Operation can handle such monitoring smartly through proper and perfect coordination with SLDC and nearby Sub-Stations by avoiding overloading of auto transformers and feeders and ensuring uninterrupted supply.
- Ensuring periodical maintenance of all auto transformers, breakers, CTs, PTs, CVTs, LAs etc, through proper coordination with other agencies like P&C, Hotlines etc.
- Ensuring safety of operating personnel.

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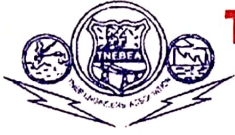
- Sub-Stations were established at huge cost at around Rs.20 crores for 110KV SS and Rs.170 crores for 230KV SS. It is imperative to post an exclusive team of authorized personnel dedicated to look after the SS activities and ensure the healthiness of all equipment and associated lines.
 - Every Sub-Station has been established in vast area at around 10 acres for 110KV SS and 25 acres for 230KV SS. It is a fact that the operating personnel find enormous difficulties in regulating the activities spread over such vast area.
- (b) Emergencies:
- Early restoration of supply in the event of breakdown.
 - Emergent occasions are multi-fold like (i) actuation of LBB (ii) actuation of bus bar protection (iii) failure of auto transformers/breakers, CTs, PTs, CVTs etc.
 - Possibilities of cascade tripping for any fault.
 - It is quite natural that shift team may be under panic condition in the event of cascade tripping. Guidance by an experienced officer is an imminent feature necessary to resolve the situation and resume the supply quickly.
 - Availability of an experienced officer in the cadre of Executive Engineer at the trouble spot is quite justified considering the following aspects involving in the troubleshooting.
 - ✓ to pool required manpower.
 - ✓ to guide the shift operators.
 - ✓ coordination with the SLDC, P&C wing, EEs/Operation at other ends, EEs & SEs of Distribution Circle.
 - ✓ Proper Monitoring of work ensuring safe working condition.
 - ✓ Arranging of required materials.
 - ✓ Appraisal to higher officials, local VIPs, public regarding the outage.
 - Guidance by an experience officer could be the only solution to tackle such situations quickly and tactfully.
10. All the three proceedings issued in the years 1977, 1996 & 2012 were with anoble aim of maintaining a healthy grid safeguarding the absolute interest of the Board, while the recent proceedings dated 05.03.2024 have been issued providing skeleton team of officers exhibiting a march towards outsourcing and ultimate privatization. There is an apprehension that these orders aim to march towards minimal strength of officers for the purpose of preparing the establishment bills of the labour proposed to be outsourced only.

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11. This Association is duty bound to point out the mandatory requirement of posting authorized personnel only to maintain and operate the EHT Sub-Stations and associated EHT lines prescribed under CEA Regulations, 2023 which are extracted below for kind ready reference:

- (a) Regulation 3(1) of the Central Electricity Authority (Measures relating to Safety and Electric Supply) Regulations, 2023 mandates that the supplier or owner of installation (here it is TANGEDCO/ TANTRANSCO) shall designate person for the purpose to operate and carry out the work on electrical lines, apparatus.
- (b) Regulation 3(2) mandates to maintain a record, in paper or electronic form, wherein the names of the designated person and the purpose for which they are designated shall be entered.
- (c) Regulation 4(1) of the above Regulations mandates that the records maintained by the designated person under sub-regulation (2) of regulation 3 shall be produced before the Electrical Inspector as and when required.

Any move to employ unauthorized persons to manage the operation and maintenance of sub-stations and associated lines would be viewed as a blatant violation of statutory laws. It would be certainly a suicidal attempt aborting the schedule of maintenance of Sub-Stations and associated lines which were established at huge expenditure besides inviting the following adverse situations:

- Delay in restoration of power supply under both planned shutdowns and unforeseen breakdowns.
- Unsafe working conditions.
- Consumer dissatisfaction due to frequent outages.
- Dent in the reputation of TANTRANSCO & TANGEDCO.
- Undesirable public criticism about the government.

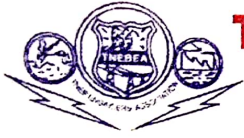
12. There cannot be any second opinion on this aspect that duration of time required to attend to the breakdown and resume normal supply in the event of 230KV/ 110KV breakdowns will be certainly minimum when such abnormal situation is handled by an experienced EE/ Operation. It is sure that the physical presence of an EE/Operation at site may fetch a reduction of breakdown time to a minimum of 2 hours, enabling a savings of around Rs.10-15 lakhs of Rupees by way of revenue realization due to reduction of breakdown time. The Association is duty bound to caution that the Study Committee has casually submitted a half-baked report

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without a proper study of all parameters connected to the maintenance and operation of EHT Sub-Stations and associated lines.

13. It is therefore imperative to reconsider the proceedings dated 05.03.2024 which was issued without a full-fledged time and motion study and without any scientific evolution of all parameters related to this important subject which governs the safety and security of all kinds of classes of consumers. It has been ordered therein to redeploy 62 posts of Executive Engineers/ Operation and 220 posts of Assistant Engineers/ Maintenance in 230KV & 110 KV Sub-Stations, effectively abolishing those essential posts in real sense. It is sure that the expenditure sought to be curtailed through such reduction of posts would be meagre when it is compared to the expenditure to be invested towards replacement against premature failure of transformers, breakers and other accessories and breakdown of EHT & HT lines, consequent to definite slippage in the maintenance of equipment and lines and delay in the restoration of supply in the absence of an experienced officer readily available at the site. Replacement costs and revenue lost are going to be enormously manifold.

14. Our earnest and humble submission is to continue the present staff pattern prescribed for 230 KV & 110 KV Sub-Stations in the year 1996 and further certified in the year 2012. It is admitted that there may be few EEs/ Operation who are not contributing. It is highly erroneous to generalize such rare information and enlarge to the whole of Grid. It is emphatically submitted that majority of the population of EEs/ Operation are delivering their best despite innumerable hurdles like dearth of skilled manpower, uninterested technical personnel posted as a penal measure due to some sort of problem in the distribution, lack of adequate vehicle facilities etc.

15. The Association, as a responsible forum comprising the true technocrats all along sailing along with the management of this vital organization, has no hesitation to agree to marginal reduction of technical personnel and effective utilization of every man hour of such technical officers as enumerated below:

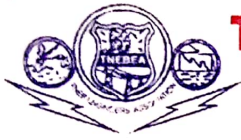
(a)	<p>Each Executive Engineer/ Operation must look after all 230 KV Sub-Stations, 110KV Grid & Non-Grid Sub-Stations in the Distribution Circle.</p> <p>Our comments:</p> <ul style="list-style-type: none">• It is practically impossible to manage the affairs of all 230KV & 110KV Sub-Stations in the entire Distribution Circle considering the hardships stated above.• Our humble appeal is to retain the same staff pattern of one
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	<p>EE/Operation for each 230 KV SS, which is in vogue since 1977.</p> <ul style="list-style-type: none">• It is seen that limited numbers of EEs/ Operation are shouldering the responsibility of maintaining the EHT lines. It is imperative that the SEs/ Operation may demarcate the jurisdiction of every EE/ Operation and assign the responsibility of maintaining the EHT Lines besides 230KV SS.• Such EEs/ Operation may also continue to exercise technical control of AEEs/ Hotlines, AEEs/ GIS & AEEs/SF6 wherever available.• In the past, TNEB has been pleased to upgrade the post of AEs in the Head Quarters Office and Hydro Stations and post AEEs, just to alleviate the suffocation due to stagnation in promotion. Let these posts continue; otherwise, promotional prospects are further staggered by one or two years.
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(b)	<p>Each AEE/ Maintenance /230 KV SS must look after 4 Nos. 110 Non-Grid Sub-Stations additionally.</p> <p>Our comments:</p> <ul style="list-style-type: none">• Our humble appeal is to retain the same staff pattern of one AEE/ Maintenance for each 230 KV SS, which is in vogue since 1977.• This AEE/Maintenance is now restricted to care for the maintenance of 230KV SS only. It is suggested that he/she may be assigned the responsibility of maintenance of EHT lines besides maintenance of 230 KV SS. Assigning additional responsibility of 4 Nos. 110 KV (NG) Sub-Stations may kindly be dispensed with.• It appears there are around 33 AEEs/ Lines & 87 AEs/ Lines ensuring the healthiness of around 30,791 kms of EHT Lines. Additional posts of AEs/ EHT Lines are to be sanctioned based on the existing norms of one AE/Lines for 100-300 kms of EHT Lines.• The existing posts of AEE/ Lines may be redeployed to monitor 110 KV (Non-Grid) Sub-Stations, since the AE/ Lines are attached to the control of AEE/Maintenance.• Every AEE/ Maintenance may be assigned the responsibility of supervising both AE/ Maintenance/ 230 KV SS and AE/ EHT Lines.
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(c)	<p>Each AEE/Maintenance/ 110KV Grid SS must look after 10 Nos. 110 KV Non-Grid Sub-Stations additionally.</p> <p>Our comments:</p> <ul style="list-style-type: none">• Our humble appeal is to retain the same staff pattern of one AEE/ Maintenance for each 110 KV SS (G), which is in vogue.• He may be assigned with the responsibility of maintaining EHT
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	<p>lines decided by the SE/ Operation.</p> <ul style="list-style-type: none">• Assigning additional responsibility of 10 Nos. 110 KV (Non-Grid) Sub-Stations may kindly be dispensed with.
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(d)	<p>Each AE/Maintenance / 110 KV Non-Grid Sub-Stations must look after 2 (Two) Nos. 110 KV (Non-Grid) Sub-Stations.</p> <p>Our comments:</p> <ul style="list-style-type: none">• This Association firmly believes at the presence of an exclusive Assistant Engineer/ Maintenance for each 110KV (Non-Grid) SS, since it is required to ensure the safety of equipment costing to Rs.20 crores and to ensure the safety of personnel engaged in the SS premises, which is priceless.• In the event of considering our suggestion to dispense with the responsibility of assigning 4 Nos. 110 KV (Non-Grid) Sub-Stations to each AEE/M/230KV SS and 10 Nos. 110KV (Non-Grid) Sub-Stations to AEE/M/110KV (Grid) SS additionally, it is necessary to consider sanction of 446 additional posts of AEEs/ Maintenance at the rate of one AEE/M for every 2 Nos. 110KV (Non-Grid) Sub-Stations as per staff pattern prescribed under (Per) (FB) TANTRANSO Proceedings No. 31, dt.10.07.2012.• These AEEs/M may be stationed at 110 KV (Non-Grid) Sub-Station with station capacity 50 MVA and above with/ without multiple ratios as 110/33-11KV & 110/33-22KV.• It is estimated that there are around 226 Nos. 110KV Major (Non-Grid) Sub-Stations with capacity 50 MVA and above among 892 Nos. of 110 KV (Non-Grid) Sub-Stations. The posts of 33 AEEs/Lines available for redeployment may be utilized here.• AEEs/ Maintained may be posted at Head Quarters of major 110KV (Non-Grid) Sub-Stations with capacity 50 MVA & above and 3 AEs/ Maintenance for 3 Nos. 110 KV (Non-Grid) Sub-Stations in a cluster of 4 Nos. 110KV (Non-Grid) Sub-Stations, ensuring the presence of one technical officer for each SS.
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16. Once again, we reiterate our plea for furnishing a copy of the report of the study committee which formed the basis of the above proceedings so that we may study it and submit our comments.



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17. This Association requests that our respected CMD may be pleased to consider our comments presented with genuine interest at the Board and seek a discussion on this subject. It is further prayed that the proceedings dated 05.03.2024 may kindly be kept deferred from the purview of implementation till revised orders are ordered consequent to such discussion.

Thanking you,
With warm regards.

Yours sincerely,


15/05/2024

(V. Shanmuga)
General Secretary

Copy to D(D), D(G) & D(P)/ TANGEDCO
Copy to MD, D(O) & D(TP)/ TANTRANSO
Copy to the Secretary/ TANGEDCO Ltd
Copy to the CE/Personnel.

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