

To
The Secretary,
Himachal Pradesh Electricity Regulatory Commission
Keonthal Commercial Complex, Khalini
Shimla 171 002

Subject: Framing of Himachal Pradesh Electricity Regulatory Commission (Terms and Conditions for sharing of cost of terminal benefits of personal of erstwhile Himachal Pradesh State Electricity board and successor entities) Regulations – 2015 –**Comments/ Suggestions for consideration**

Reference: HPERC/F(5)(3)(1)/2013-14/3866 dated 11/2/15

Sir,

I thankfully acknowledge the above communication and on behalf of the association offer following comments/suggestions for consideration and inclusion in the final regulations:

Experiences / Comments and Suggestions

- 1. Pensioners are the treasurer to our society. Families/ societies, who progress- regard and respect their elders/seniors.** Experience of the elders is certainly a foremost attribute that youngsters can gain from them. It is synonymous to the families where regard and respect of the elders go in long run to the progress and harmony in the families.
- 2. Existence of most of the assets which the HPSEBL has as on today is only attributable to the hard work done by the present pensioners** may it be Asia's largest HEP i.e. Nathpa Jhakri, or other projects or 100% electrification of the state, the vast transmission network etc. etc.

3. *It needs to be understood that **the pension and terminal benefit is not a dole but a right of the pensioners which has been rightfully earned with massive hard work.***
4. ***The formulation of the draft regulations is a welcome step by the HPERC***
5. *In context to para 1 to 4 above the HPSEB pensioners welfare association has following comments/suggestions:*
 - 5.1. *It is the general phenomenon that the institutions/organizations having business with each other carry out the adjustments in payable and receivables or go on keeping pending the payments of payables for one or the other reasons. There is a live instance that the claims of crores raised to PSEB, HSEB and DESU on account of leave and pensionary contribution of the employees allocated to H.P. on re-organization of Punjab in 1966, were never paid. There must be clear cut protective clause in the regulation so that no payment is held up or adjusted.*
 - 5.2. *As has been experienced in the cases of amount deposited by other Deptts./parties against Deposit works. The Board utilizes that amount for other purposes and owing to which the Deposit works are delayed for want of funds/material, whereas the amount deposited for specific works should be kept separately to be utilized only for those works as per requirement. The same practice is apprehended in case of contributions proposed to be received from other entities. The share of contribution received should be maintained separately so that this amount is not utilized for other business of the Board.*
 - 5.3. *There should be a clause advising the HPSEBL to Carry out accounting transactions for receivable contributions from the respective entities on tentative basis in the beginning of Financial Year in the month of April by debit to "**Pension Contribution Receivable**" by credit to "**Terminal benefits***

payable” and final adjustment are made in the end Financial Year.

- 5.4. *A clause in the regulations is essentially required advising the HPSEBL to evolve a mechanism for timely payments to prevent/eliminate delay in release of the terminal benefits including arrears of D.A. and medical claims etc. payable on time. It is unfortunate that the pensioners are being treated as second grade entities, may it be issuance of orders for defraying their justified claims including medical or any other ones. The order for grant of pension allowance @5%, 10% & 15% of the basic pension was issued by the Himachal Pradesh Govt. on 23/4/14 but unfortunately the orders in HPSEBL have not been issued till date despite one year going to be elapse. Sometime, even a simple endorsement takes 6 months, whereas the Himachal Pradesh Govt. orders which are only to be endorsed should not be delayed and Executive Director should be authorized to do the needful.*
- 5.5. *Though the sharing of liability by Govt. of Himachal Pradesh has been shown as return on equity but for any eventuality the Himachal Pradesh Govt. should not be absolved of statutory guarantee provided for by them in the transfer scheme.*

(B.K. Sood)
President