

Report on Second Training of Trainers Workshop for CONASC Partners

August 22-23, 2019, Jaipur, Rajasthan

Background Note

CUTS International and Bask Research Foundation have been implementing a project on 'Capacity Building of Electricity Consumers' in Rajasthan with support from Shakti Sustainable Energy Foundation and, as part of the capacity-building objectives of the project, a two day 'Training of the Trainers' Workshop was conducted on August 22-23 in Jaipur with the Consumer Assistance Cell (CONASC) partners of the project.

The primary aim of the workshop was to deliberate on the challenges and opportunities experienced during the CONASC operations, with the aim to optimise future strategy and streamline grass-root operations. In the process, the participants were also trained on policies and regulations pertinent to prominent issues that have emerged during the initial phase of the CONASCs' activities. The list of participants is attached as Annexure-I. Feedback on the training program was solicited via feedback forms and the details are provided in Annexure-II.

The training workshop culminated in the CONASC partners developing a robust understanding of the regulations relevant to the issues at the grassroots, and streamlining of the operational strategy. Session-wise details of the workshop along with significant findings and information shared during the discussions are provided below:

I. Opening Session

Simran Grover, Bask Research Foundation, welcomed the participants and provided a brief background of the workshop. Thereafter, Anurag Mishra, CUTS International explained the structure of the roundtable and the objectives of the various sessions.

II. Session I: Experience and Challenges Faced by CONASCs

a. Overview

The purpose of the session was sharing of experiences and challenges faced by grass-root partners while implementation of the CONASC activities in targeted districts. The grass-roots partners delivered presentations on the activities,

experiences, challenges and learnings from their field activities. Madan Giri Goswami, CUTS Centre for Human Development Chittorgarh (CHD), Hari Prashad Yogi, Consumer Legal Help Society, Sawai Madhopur and Dipak Gode, Desert Resource Centre, Bikaner gave presentation for their respective districts, which were followed by feedback and inputs by respective nodal officers. The subsequent floor discussion focused on optimising strategies of implementation based on these learnings and experiences.

b. Proceedings

During the presentation and subsequent floor discussion, several critical issues and suggestions had emerged. A few issues were uniform throughout the project areas and not specific to a particular Discom, such as bill reading and delivery to the consumers, which was problematic and delayed in all the CONASCs target areas as was incorrect billing. Brief details of the session (presentation wise) are provided below:

CUTS-Centre for Human Development, Chittorgarh

- The prominent issues encountered in Chittorgarh and Bhadesar districts were delayed receipt of new agriculture connections and cases where consumers were charged with theft of electricity on unjustified grounds.
- The Chittorgarh CONASC has recorded short videos of consumers, detailing the common issues faced in village as part of their evidence-building activities. These are disseminated to electricity officials at the district level, and are a supporting evidence for complaints.
- Some major challenges faced in the Chittorgarh CONASC are the lack of awareness of consumers about Discom procedures, the tendency of electricity theft in some parts, the disinterest of some Discoms in resolving consumer complaints.
- Liaising has helped in getting them support from the SE, who has also requested other officials in his jurisdiction to attend some awareness meetings conducted by the CONASCs.
- Chittorgarh and Bhadesar team will be using RAPDRP (Web Self Service) portal for verification and analysis of bills.

Consumer Legal Help Society, Sawai Madhopur

- The major issue encountered in Sawai Madhopur and Bonli areas was faulty metering and billing.
- The Sawai Madhopur team has been using JVVNL's Bijli Mitra App for verification and analysis of complaints related to bill and meter issues.

- In Sawai Madhopur CONASC, infrastructural problems are being recorded with photographs, which act as supporting evidence for complaints and void the need for a report from the local line-man, reducing a hurdle towards resolution.
- Schools and Colleges are being targeted as sites for awareness generation.
- Some challenges faced by Sawai Madhopur team include absence of GRSF below the Circle Level and difficulty in getting acknowledgement on complaints from the Discom offices.

Desert Resource Centre, Jodhpur and Bikaner

- Prominent issues in Bajju and Phalodi areas were the incidence of theft cases, lack of meter readings as the dust on meter panels made reading the meters difficult, non-issuance of new connections, and frequent absence of local electricity officials from their offices.
- The CONASC in Phalodi, which is the newest CONASC, has found limited authorized usage of electricity in its target area.
- The complexity of the local political economy situation may require it to focus on concerns such as formalising consumers, rather than grievance redressal and consumer capacity building. In this regard, after a complete understanding of the grassroots situation, a decision may be made to shift the target area.

c. Discussion / Follow Up / Conclusion

- It was highlighted that CONASC should prioritise complaints for resolution in order to maximise impact.
- It was highlighted that distribution companies have employed third-party contractors for maintenance of distribution network. Since consumers perceive such contractual workers as not being distribution company staff, they are reluctant to employ them for maintenance work. Additionally, these contractual workers also demand unjustified money from consumers.
- Complaints received during awareness meetings are often village-level issues. Complaints that are common, rather than individual, in a target village may be compiled and submitted to DISCOM officials highlighting the issue. Greater effort should be placed on resolving consumer-specific complaints.
- For old cases, particularly related to Vigilance Committee Report (VCR), collecting evidence is challenging. The project team may decide whether such consumer complaints should be registered by CONASCs.
- As the initial phase of the CONASCs is now complete and all six CONASCs have been launched, an effort would be made to assess the value of the CONASC operations to the DISCOM.

- The Sawai Madhopur CONASC will attempt to demonstrate greater uptake of the JVVNL's app, and other measurable outcomes will be utilised to generate support from DISCOMs.
- The operational strategy of the CONASCs should be reoriented with focus on resolution of complaints through advice and assistance and developing the capacity of consumers to advocate for themselves.
- Cross-learnings between the CONASCs are necessary. For this purpose, videos taken during the awareness meetings will be shared regularly, and CONASC partners may also attend each other's awareness meeting.
- Policy inputs for DISCOMs, RERC and the State Government need to be formulated based on evidence generated through CONASC operations. It will help in generating buy-in from the DISCOMs and RERC. This could also include generating evidence on use of existing tools such as Bijli Mitra and Toll Free Numbers.

III. Session II. Role of CONASC and Strategy for Effective Working

a. Proceedings

- A major responsibility of the CONASCs is the capacity building of consumers. The CONASCs should aim to make them cognizant of their rights and responsibilities.
- The outreach programs must promote awareness of the grievance redressal mechanism and the procedures of DISCOMs, as well as developing community support for the CONASC.
- The CONASC partners should put conscious effort towards building a relationship with local DISCOM officials and developing channels of communication.
- The CONASC partners should recognise issues that need to be escalated to the DISCOM top management or to be brought to the attention of policymakers.

b. Follow Up/Conclusion

- The CONASC should encourage consumers with genuine grievances to lodge complaints at GRSF, which will be able to garner accountability from DISCOMs.
- The CONASC representatives and nodal officers should identify and highlight issues that require intervention at policy level of the state or the DISCOMs.

IV. Session III: Interactive Session on Billing, Metering and Other Issues Faced at CONASC and Their Resolution

a. Overview

P.K Gupta, XEN-Commercial, Jaipur Vidyut Vitran Nigam Ltd, conducted the session.

b. Proceedings

There was a brief description of the most common complaints, such as faulty meters, incorrect or infrequent meter-reading, improper or irregular billing, and lack of understanding of bills by consumers. The session also provided the opportunity to discuss some of the critical complaints that had been registered by CONASCs.

- There were several questions requesting clarity on points of procedure:
 - Retrospective billing is not permissible under the Electricity Act, but the same is exercised by Discoms.
 - There are several methods for consumers who have been charged for theft or unauthorised usage of electricity to appeal their cases and the CONASC team in areas with issues of unjustified theft charges should study them carefully.
 - Methodology for calculation of fuel charge and fixed charges were discussed so that the CONASC partners can understand the bills that are being brought by consumers complaining of incorrect charges.
 - The procedure for the receipt of Rajasthan's farmer subsidy scheme was clarified. The CONASC partners were made aware of the fact that Direct Benefit Transfer would be implemented only if farmers have their bills in their own names (rather than their parents'/grandparents' names, which is a common scenario). Their Aadhaar will be validated and their bank account has to be connected to the Aadhaar.
- Some issues were flagged for possible further escalation and intervention at the policy level:
 - The electricity bill should explicitly mention the amount under rebate and subsidy category. This would ensure that consumers are better informed and are incentivised to gain rebates for early payment.
- There were no permanent solutions for meters, which are unable to be read due to dust other than installation of meters appropriate for the climate.
- Farmers in many regions are unable to access electricity (three-phase connection) due to inadequacy of infrastructure and capacity gaps. Therefore, feeder augmentation is required and the CONASC would encourage farmers to

pressurise the Discoms at the district level for the same. Interventions at a higher level on the above point may also be taken up by the project team.

c. Follow Up/Conclusion

- CONASC partners must review relevant rules and regulations such as procedures for connection/disconnection, rates for rebates, charges, etc. of the Terms and Conditions of Supply (TCoS) and other documents provided during current and previous ToT (Training of the Trainers Program).
- Infrastructure and community level issues must be pursued at both, local and corporate levels management within DISCOMs.

V. Session IV: Tackling Challenges and Problems (CONASC): Importance of reducing electricity theft and strategies for change

a. Proceeding

- The procedure under which a Vigilance Committee Report may be filed against consumers was shared. The procedures to appeal and the circumstances, which allow them to appeal against a VCR were discussed with reference to real cases. There are Appellate authorities and VCR monitoring committee for resolution of VCR related cases. The circulars with the details would be shared by the nodal officers.
- There are cases where the political economy situation is complex and a large number of connections are unauthorised but action cannot be taken; this prevents the CONASC from working effectively for grievance redressal.
- The procedures for prima facie verification of consumers' complaints were discussed, particularly in relation to billing, where previous bills may be scrutinised for trends. Some complaints may be directly addressed by officials in CONASC, such as incorrect billing problems. Some bills, related to incorrect metering issues, require onsite verification.
- A Bill Calculator tool developed by the project team was introduced during the session. Vishal Narula demonstrated the usage of the tool with a sample electricity bill. The tool will be customised for application by CONASC partners and shared with them in due course.
- According to the DISCOMs' records, no consumer has filed an application for compensation due to the electricity provider not meeting the Standards of Performance (SoP). The compensation rates noted in the SoP guidelines are low, and consumers may be unwilling to go through the complex procedures required to avail them.

b. Follow Up/Conclusion

- Issues with compensation and infrastructure problems cannot be solved in the short-term but individual complainants may still try, in order to pressurise the DISCOM to make improvements at the local level. The same can be taken up collectively at appropriate forums by respective CONASCs.
- Given the limitations in resource and time, the CONASCs should focus on identifying and putting effort towards cases with the possibility of high impact, and feeding the evidence from the ground to policymakers.

VI. Session V: Consumer Rights in Electricity Related Investigations, Damages, Service Default by DISCOMS

a. Overview

Vishal Narula delivered a presentation on consumers' rights in cases of electricity related investigations, damage due to DISCOM performance, and service defaults by DISCOMs. The issues discussed included Standards of Performance related to aspects such as restoration of supply, voltage variation, testing of meters, shifting of meter and service lines, issues regarding re-deposition of security deposit for meter, disconnection, and losses related to death and injury, and theft.

b. Proceedings

- Various points of relevance to CONASC operations were made:
 - After disconnection and issuance of no dues certificate, the consumer should not be served an electricity bill.
 - In case of losses related to death or injury a Personnel Wing circular has the details of the compensation to be provided. This would be identified and shared with the CONASC partners by nodal officers.
 - For cases where a consumer applies for compensation for equipment damage, the Discom will only accept a case where there is proof that other households in the area have also been impacted, as a verification mechanism. The CONASC may also note that they should request for such proof in case a consumer requesting compensation, approaches them for advice.

c. Follow Up/Conclusion

- The information provided during the session need to be shared with consumers during awareness workshops.
- Pamphlets explaining various components of electricity bill in Hindi should be printed and distributed.

VII. Session VI: Standard Operating Procedure for CONASC

a. Overview

Anshuman Gothwal, Bask Research Foundation conducted the subject session. The session elucidated in detail about the main objectives and functions of CONASC. It discussed various standard operating procedures for the effective functioning of CONASC and better communication between CONASC, DISCOM and project team.

b. Proceedings

The procedures and operational strategy of the CONASCs had been discussed and finalised previously. Emphasis was laid on a few relevant points, as shared below:

- The CONASCs should aim to present themselves as neutrally as possible, developing positive relationships with the local Discom officials as well as the community they work in.
- The rules and guidelines for the outreach events to be conducted, the data to be prepared and the procedure to share them were discussed in case any clarification was required. The timeline for complaints to be registered and subsequent action to be taken on them was also discussed.
- The minimum number of meetings to be conducted with Discom officials at each level (district, sub-divisional level, and the local line-man) was also discussed.

c. Follow Up/Conclusion

CONASC staff may incorporate any additional strategy to optimise their performance in consultation with their nodal officer.

VIII. Session VII: Data Formats, Reporting and Data Collection (Monitoring and Evaluation)

a. Overview

Anurag Mishra discussed existing data formats, reporting and data collection schemes with CONASC representatives.

b. Proceedings

- The CONASC staffs were asked to provide the details of any challenges faced in filling up the three forms.
- The following suggestions came up during the discussion:
 - Form II for awareness meetings requires an additional column for gender of participants.
 - In Form I, consumer category had to be added.

- Following the discussion, an exercise was conducted with CONASC partner where they were trained on interaction with consumers and filling up the complaint details in Form-III.

c. Follow Up/Conclusion

CONASC partners learnt to register complaints with higher accuracy and requisite details. It was agreed to focus on data collection and reporting in future as it has remained the weakest link in CONASC operations.

IX. Session VIII: Activity Plan for Next 3 Months

a. Overview

During the session, the CONASC partners were requested to submit a tentative plan of planned activities for next three months.

b. Proceedings

Tentative activity plans were prepared for the next three months, which estimated the outreach of each CONASC, identifying targets for recording of complaints, and activities to be completed.

c. Follow Up/Conclusion

Nodal officers will work with CONASC staff to finalise the activity plans for the next three months.

Closing Remarks

It was reiterated that CONASCs need to focus on streamlining their activities and generating evidence for policy level engagement with DISCOMs and RERC. The roundtable concluded with a vote of thanks to all the participants.

Performance and Feedback

The performance of the participants was assessed through pre- and post-workshop questionnaire. The analysis of these forms is provided in Annexure-II. The feedback forms filled by participants were also analysed, and a graphical representation is provided in Annexure-III.

Annexure-I

List of Participants

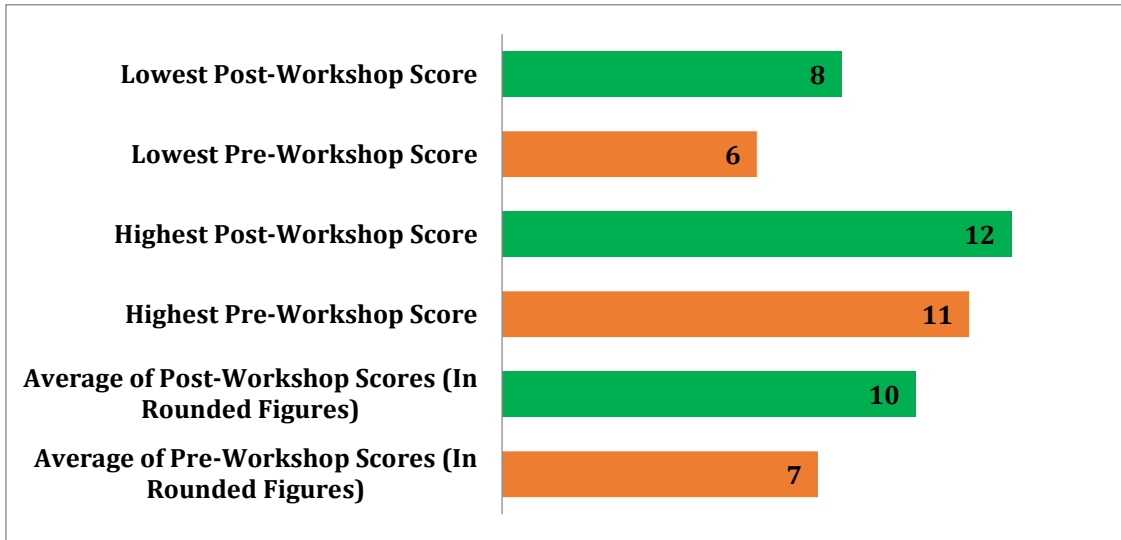
Name	Designation and Organisation	Place
Mohan Lal Meghwal	Programme Assistant, CUTS CHD	Chittorgarh
Shyam Lal Tailor	Chairman, Upbhokta Suchna and Paramarsh Samiti	Chittorgarh
Harsh Kumar Sharma		Bonli, Sawai Madhopur
Chagan Lal Prajapat	Desert Resource Center	Phalodi, Jodhpur
Dipak N. Gode	Desert Resource Center	Kolayat, Bikaner
Hari Prashad Yogi	President, Consumer Legal Help Society	Sawai Madhopur
Uma Shankar Yogi	Consumer Legal Help Society	Sawai Madhopur
Madan Giri Goswami	Senior Programme Office, CUTS CHD	Chittorgarh
Anshuman Gothwal	Executive Director, Bask Research Foundation	Jaipur
Simran Grover	CEO, Bask Research Foundation	Jaipur
Vishal Narula	Research Associate, Bask Research Foundation	Jaipur
Anmol Soni	Research Associate, Bask Research Foundation	Jaipur
Anurag Mishra	Associate Fellow, CUTS International	Jaipur
Deepak Saxena	Assistant Director, CUTS International	Jaipur
Udai S. Mehta	Deputy Executive Director, CUTS International	Jaipur
Mohini Ganguly	Research Associate, CUTS International	Jaipur
Akshay Sharma	Programme Associate, CUTS International	Jaipur

Resource Persons

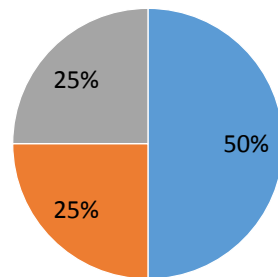
Name	Designation and Organisation	Place
P.K. Gupta	Xen - Commercial, JVVNL	Jaipur

Annexure-II

Participants' Scores on Knowledge Assessment Questionnaire (out of a total score of 15)

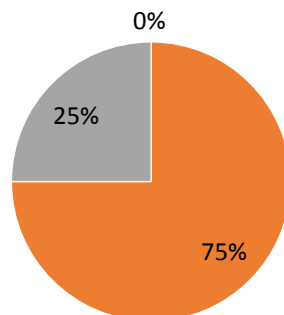


Pre-Workshop Performance



- Percentage of participants scoring less than 50% of score possible
- Percentage of participants scoring 50-70% of score possible
- Percentage of participants scoring more than 70% of score possible

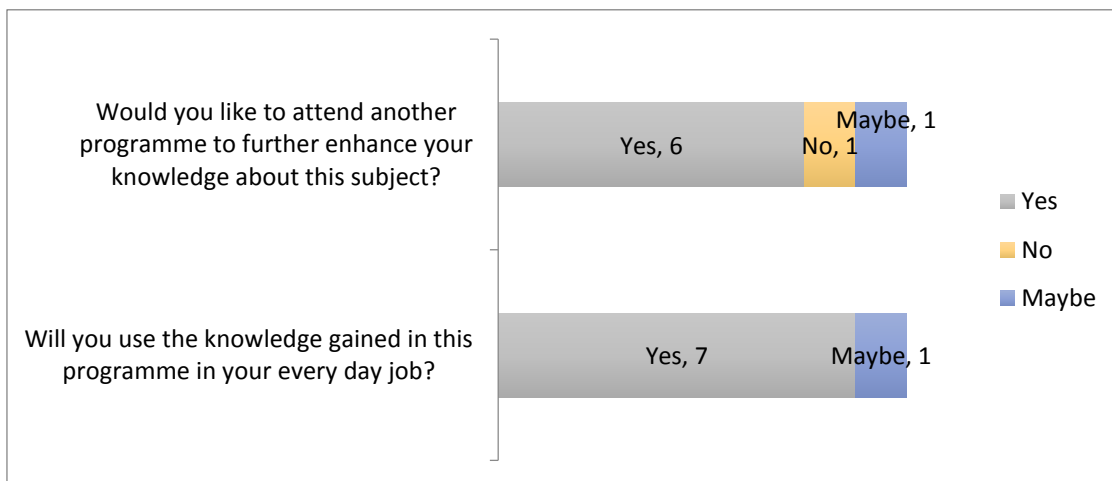
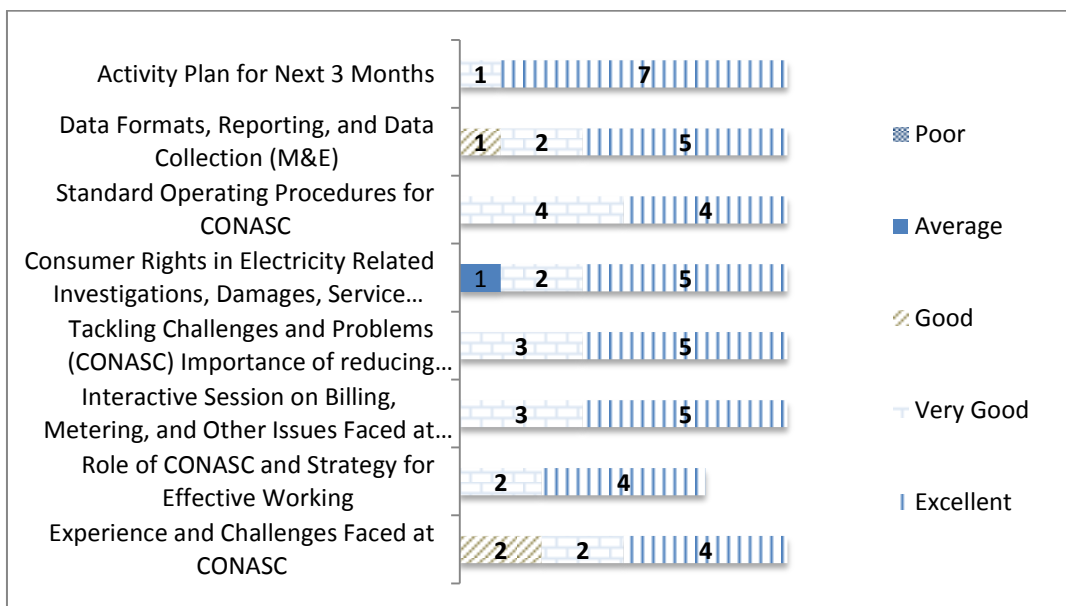
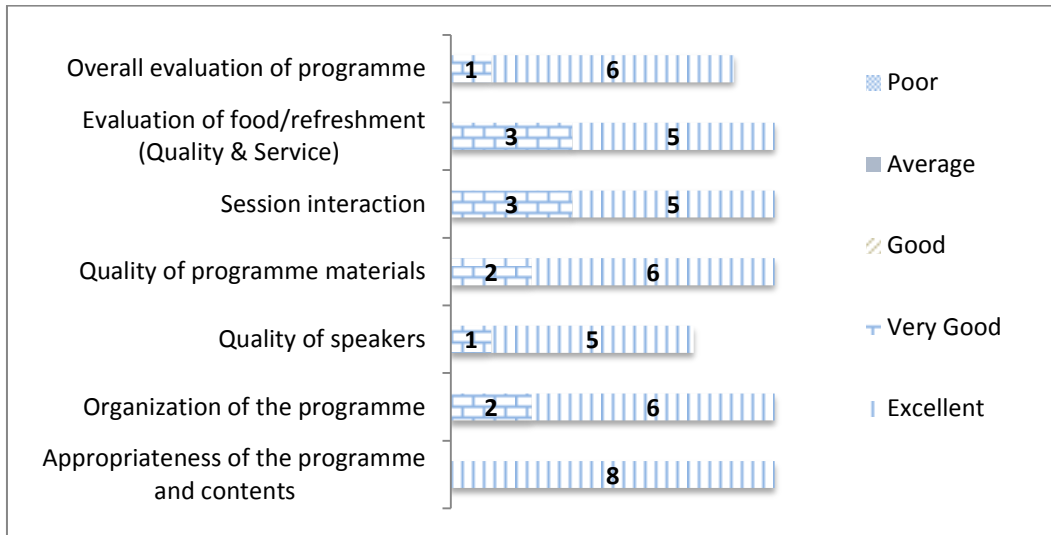
Post-Workshop Performance



- Percentage of participants scoring less than 50% of score possible
- Percentage of participants scoring 50-70% of score possible
- Percentage of participants scoring more than 70% of score possible

Annexure-III

Feedback on the workshop



Glimpses

