

**BEFORE THE HON'BLE NATIONAL GREEN TRIBUNAL,
SOUTHERN ZONE, CHENNAI**

ORIGINAL APPLICATION NO. 51 OF 2020 (SZ)

Tribunal on its own motion
Suo Moto based on the news item published in
Dinamalar Newspaper dt. 27.02.2020, Chennai
Supplementary, "Elephant Indian Wild Board
Dies of Electrocutation"

... Applicant

Versus

The Secretary to Government of Tamil Nadu,
Department of Forest,
Chennai and Others

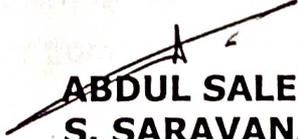
... Respondents

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Dated at Chennai on this the 28th day of October, 2020

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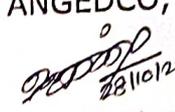
... Respondents

**REPLY STATEMENT FILED ON BEHALF OF
THE 3RD AND 5TH RESPONDENTS**

I, V. Jayaprakash, Son of Mr. P.Venkatapathy, aged 51 years, the
Executive Engineer of Tamil Nadu Generation Corporation
(TANGEDCO), having address at Devarsola Road, Gudalur, The Nilgiris,
do hereby solemnly affirm and sincerely state as follows:-

1. I state that I am the Executive Engineer, Operation and
Maintenance, Tamil Nadu Generation Corporation (TANGEDCO),
representing the 3rd and 5th Respondents and as such I am well
acquainted with the facts of the case from available records. I am filing
this Reply Statement on behalf of the 3rd and 5th Respondents in my
official capacity and I am authorized to file the same.

2. I humbly submit that the above application has been suo moto
registered by the Hon'ble Tribunal on the basis of the paper report
published in the Dinamalar Newspaper - Chennai Supplementary
dated 27.02.2020. This Hon'ble Tribunal in its order dated 02.03.2020
has constituted a Joint Committee comprising of (1) The Principal Chief
Conservator of Forest & Head of Forest Force, Tamil Nadu, Chennai (2)
The Chairman cum Managing Director, Tamil Nadu Generation and
Distribution corporation (TANGEDCO), (3) The Divisional Forest Officer,
Gudalur Division and (4) The Superintending Engineer, TANGEDCO,


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Nilgiris District, Udthagamandalam, to enquire in respect of the area in question and submit a factual and action taken report against the erring officials and the precautionary steps taken by both the Departments to prevent such things in future.

3. I humbly submit that the Joint Committee report has been submitted before this Hon'ble Tribunal and the same may be treated as part and parcel of this Reply Statement.

4. I humbly submit that 66 KV Singara - Calicut & Cannanore Double Circuit Line was laid during the year 1930 from Singara Power Station and subsequently energized during the year 1932 to give Extra High Tension supply to Kerala State.

5. I humbly submit that the total number of towers up to Tamilnadu boundary is 138 nos. and for a distance of 46 kms, the 90% lines are laid through Mudumalai Tiger Reserve and other thick forest areas and the above lines are still in service up to Tower No. 138 to give EHT supply to (i) 66 / 11 KV Gudalur substation, (ii) 66/11 KV Upatty substation and (iii) 66/11 KV Cherambadi substation. After commissioning of the above Substations till date no accident has occurred wither to any wild animal or to any human being, except the subject issue from the year 1932. The details of 66/11KV Substations are as follows:-

i. 66/11KV - GUDALUR SS

The 66/11 KV Gudalur substation consisting of four numbers 11 KV High tension feeders for a total length of 95.58kms which has been commissioned during the year 2016.

Gudalur substation having

Total no. of 11KV HT Feeder	: 4 Nos	(Town feeder, Ovelly feeder, Devarhola feeder, Killoor feeder)
HT services	: 11 Nos	

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Total length of HT feeder	:	95.58	Kms
LTCT services	:	12	Nos
Total No. of LT services	:	39402	Nos
a) Domestic	:	30343	
b) Commercial	:	4404	
c) Industrial	:	123	
d) Others	:	4532	

ii. 66/11KV - UPPATTY SS

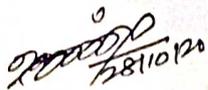
The 66/11 KV Uppatty substation which has been commissioned during the year 1954.

Total no. of 11KV HT Feeder	:	5 Nos	(Pandalur feeder, Rockwood feeder, Kollapally feeder, Cherangode feeder, Gudalur feeder)
HT services	:	9 Nos	
Total length of HT feeder	:	110.979	Kms
LTCT services	:	5	Nos
Total No. of LT services	:	18886	
a) Domestic	:	14911	
b) Commercial	:	1770	
c) Industrial	:	82	
d) Others	:	2123	

iii. 66/11KV - CHERAMBADI SS

The 66/11 KV Cherambadi substation which has been commissioned during the year 2001.

Total no. of 11KV HT Feeder	:	3 Nos	(Nestle feeder, Wentworth feeder, Erumad feeder)
HT services	:	3	Nos
Total length of HT feeder	:	35.27	
LTCT services	:	0	
Total No. of LT services	:	7911	
a) Domestic	:	6055	
b) Commercial	:	879	
c) Industrial	:	20	
d) Others	:	957	


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All the above three substations are feeding supply to the entire Gudalur and Pandalur Taluks of Nilgiris District and the details of services are as follows:-

Total No. of HT services	23
Total No. LTCT services	17
Total No. LT services	66199

6. I humbly submit that the entire lines are periodically checked by the Electricity Department regularly and if any defects are noticed, it is set right then and there. Further as stated above, no electrical accident has ever occurred to any animals / human beings since 1932 except the subject issue which also was due to the act of the animal.

7. I humbly submit that in the meantime, the subject accident had occurred since the elephant had pushed the structure with enormous strength and the Iron Pole DP (Double Pole) structure had completely moved to a distance of about 152 mm and hence the jumper connecting the two ends of the phase had stepped out of the pin insulator and touched the top channel of the DP and the animal would have got electrocuted through structure pole at that moment of pushing the DP structure. Subsequent to the accident, the jumper in the DP structure was properly connected with pin insulator with strong binding and new stay sets were provided in the DP structure on 26.02.2020 itself.

8. I humbly submit that as per Chapter VII Para 58 (3)(i) of Central Electricity Authority Regulations 2010, Clearance above ground of the lowest conductor of overhead lines of voltage upto and including 11,000 Volts is **4.6 Metres i.e., 15 feet**. The said regulations read as follows:-

"58. Clearance above ground of the lowest conductor of overhead lines.-

(1)

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(2)

(3) No conductor of an overhead line including service lines, erected elsewhere than along or across any street shall be at a height less than -

(i) for lines of voltage up to and including 11,000 Volts, if bare - 4.6 metres (i.e., 15 feet)

(ii) for lines of voltage up to and including 11,000 Volts, if insulated - 4.0 metres

(iii) for lines of voltage exceeding 11,000 Volts but not exceeding 33 kV - 5.2 metres"

9. I humbly submit that in the accident spot, the clearance of the overhead line from ground level is 21 feet which is well above the norms (15 feet) prescribed by the Central Electricity Authority. This apart, there is no low sagging of lines in the accident spot and there is no snapping of conductor in the accident point.

10. I humbly submit that the accident site was inspected once again by the Superintending Engineer, TANGEDCO, Nilgiris, along with officials of TANGEDCO on 17.03.2020 and confirmed that the jumper in the DP structure was properly connected with the pin insulator with proper binding and the new stay sets have been provided in the DP structure.

11. I humbly submit that as per the mutual discussion with the District Forest Officials, the following precautionary measures have been taken by the TANGEDCO to avoid accidents to the wild animals in the forest area :-

- i. 47 Locations in the entire area of Gudalur and Pandalur have been identified for further heightening of lines by the Forest Officials and the same have been attended.
- ii. Further regular maintenance works are being carried out in Cherambady 66/11KV SS and the associated HT lines


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emanating from SS to prevent breakdowns and to ensure proper operation of the SS equipments .

iii. The entire HT lines of 11 KV Feeders fed from the above three substations passing through the forest area had been line patrolled and found normal.

iv. Damaged / corroded poles are being replaced then and there.

v. Deteriorated and aged conductors identified and replaced.

vi. Guarding arrangements are being provided wherever necessary.

vii. Poles are being inserted in the lengthy lines to maintain adequate clearance between ground and Lines.

viii. Cutting of tree branches are being carried wherever necessary

ix. It is proposed to provide fencing arrangements around the DP (Double Pole) structure and poles located in the forest remote area.

x. Further contact nos.of TANGEDCO officers/staff in the forest remote areas are published in dailies / website so that if any information received over phone/mobile about any accident to human/wild animals, the staff can reach the spot and can take immediate remedial action.

12. I humbly submit that apart from the above, the following preventive measures are being taken by TANGEDCO regularly to avoid accident:

i. Replacement of damaged/corroded poles.


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- ii. Set right of leaning poles.
- iii. Replacement of deteriorated/aged conductors.
- iv. Provision of guarding arrangements.
- v. Resagging / Rectification of low sagging overhead lines.
- vi. Stay cut renewal.
- vii. Insertion of poles.
- viii. Copping of poles.
- ix. Checking of correctness and required sizes of HG and LT open fuses.
- x. Maintenance of adequate tree clearance by clearing tree branches.
- xi. Provision of HT/LT jumper fuses for lengthy spur lines and lines running in dense forests.
- xii. Provision of pole earthing to all HT poles and Tail end SC point/cut point/DT end/Tapping end/Once in 3 poles in respect of LT poles.

13. I humbly submit that in the interest of wild animals and general public, the following improvement works have been carried out regularly in the forest area:

- i. Total no of corroded and damaged poles replaced in the forest area during the year 2019-2020 was 51 Nos and during the year 2020-2021 was 21Nos.
- ii. Further heightening of lines were carried out for 3.5 kms during the year 2019-20 and for the year 2020-2021 was 1.5kms.
- iii. During the year 2019-2020, 53Nos of new poles and 2020-2021 20Nos of new poles have been inserted to increase the ground clearance in order to maintain ground clearance as per the Norms at various locations in and around Gudalur and Pandalur Taluk to avoid accident in the forest areas.


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iv. During the year 2019-2020, 15Nos of damaged stay and 2020-2021, 15Nos of damaged stay have been rectified to increase the ground clearance in order to maintain ground clearance as per the Norms at various locations in and around Gudalur and Pandalur Taluk to avoid accident in the forest areas.

14. I humbly submit that computer based power failure Redressal call centre is functioning at Nilgiris EDC. Consumers can register their power supply failure complaints by dialling a number 1912. Address of the consumer is retrieved at this call centre from the computer database on the contact phone number of the consumer. During the year 2019-20, 700 Nos. of fuse of calls had been received and rectified then and there.

i. Further it has been published in the dailies by furnishing the contact Nos. of TANGEDCO officials area, to inform in case of fuse of calls and any other electrical faults.

ii. Display Boards are also kept at various locations about the electricity awareness to prevent accidents. Moreover awareness campaigns are conducted in schools regularly. Further wide publicity and awareness are created among the Public through dailies and media as given below:

a. If any snapped electricity conductors are noticed, Inform the Electricity Board and not to touch or go near the snapped conductor.

b. Do not transport vehicles, ladders etc, which are higher in height beneath the electric over head lines.

c. Do not park lorries near transformer structure or electric lines and carry out loading and unloading of materials.

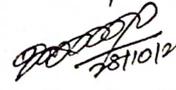

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- d. Do not tie poultries / domestic animals to the electric poles / stay wires.
- e. Do not use electric poles as support to pandals or displaying advertisement board.
- f. Handle the electrical apparatus carefully and to contact TANGEDCO staff/officials for fuse off call complaints.

15. I humbly submit that apart from the above preventive measures, to meet out situation arising out of monsoon floods and cyclone the following measures are being adopted:

- i. Pre-monsoon inspection of all EHT, HT and LT lines are carried out thoroughly. Rectification works required are also carried out meticulously.
- ii. All the structures are inspected thoroughly, loose jumpers and clamps tightened and lightning arrester connections checked up.
- iii. In all cyclone prone areas, the distribution lines are strengthened by providing additional stays. Tall trees are cleared to avoid falling on the lines.
- iv. The Overhead lines are kept out of service in the areas likely to be affected by heavy wind and rain, flood, cyclone etc. to avoid damage due to snapping of conductors, electrocution etc.,
- v. Sub-station operators are instructed not to recharge the lines before the fault is cleared. They should charge the feeders only after ensuring safety of the public after patrolling the feeders.

16. I humbly submit that apart from the above works, TANGEDCO assures that the EHT/HT line patrolling is being carried out without any


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slippage to avoid any unnecessary accidents in future to both animals and human beings. Despite of dearth of staff and the toughest terrain of Nilgiris no such accidents happened in the past year.

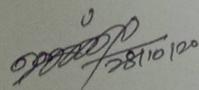
17. I humbly submit that this Respondent is strictly complied with of all the norms and regulations, without any default. Further, this Respondent conducting a periodical inspection i.e., every 3rd Monday of the month, in the entire district of Nilgiris and ensures the power supply lines and poles are intact.

18. I humbly submit that this Respondent and the Forest Department are mutually agreed to carry out monthly inspection of HT/LT lines in the forest areas and to set right the low sagging of HT and LT lines if any found during the inspection.

19. TANGEDCO is serving the entire state of Tamil Nadu for providing electric power supply to cities, towns, villages and remote habitations and is serving 3.07 crores consumers. Upliftment of hilly tribal people has been significantly improved due to providing electric power supply. As electricity is the fundamental need for development of economy of individual and State of Tamil Nadu, extending power supply with all possible safety precautions is being carried out by TANGEDCO. TANGEDCO will further concentrate on maintenance of these forest area electric lines to avoid such accidents in future.

Under the above circumstances, I humbly pray that this Hon'ble Tribunal may be pleased to record the above submissions and close the application and pass such further or other orders as this Hon'ble Tribunal may deem fit and proper in the circumstances of the case and thus render justice.

Dated at Chennai on this the 28th day of October, 2020


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VERIFICATION

I, V. Jayaprakash, Son of Mr. P.Venkatapathy, aged 51 years, the Executive Engineer of Tamil Nadu Generation Corporation (TANGEDCO), having address at Devarsola Road, Gudalur, The Nilgiris, do hereby verify that the contents of Paragraph Nos. 1 to 19 are true to the best of my knowledge and believed to be true on legal advice and that I have not suppressed any material fact.

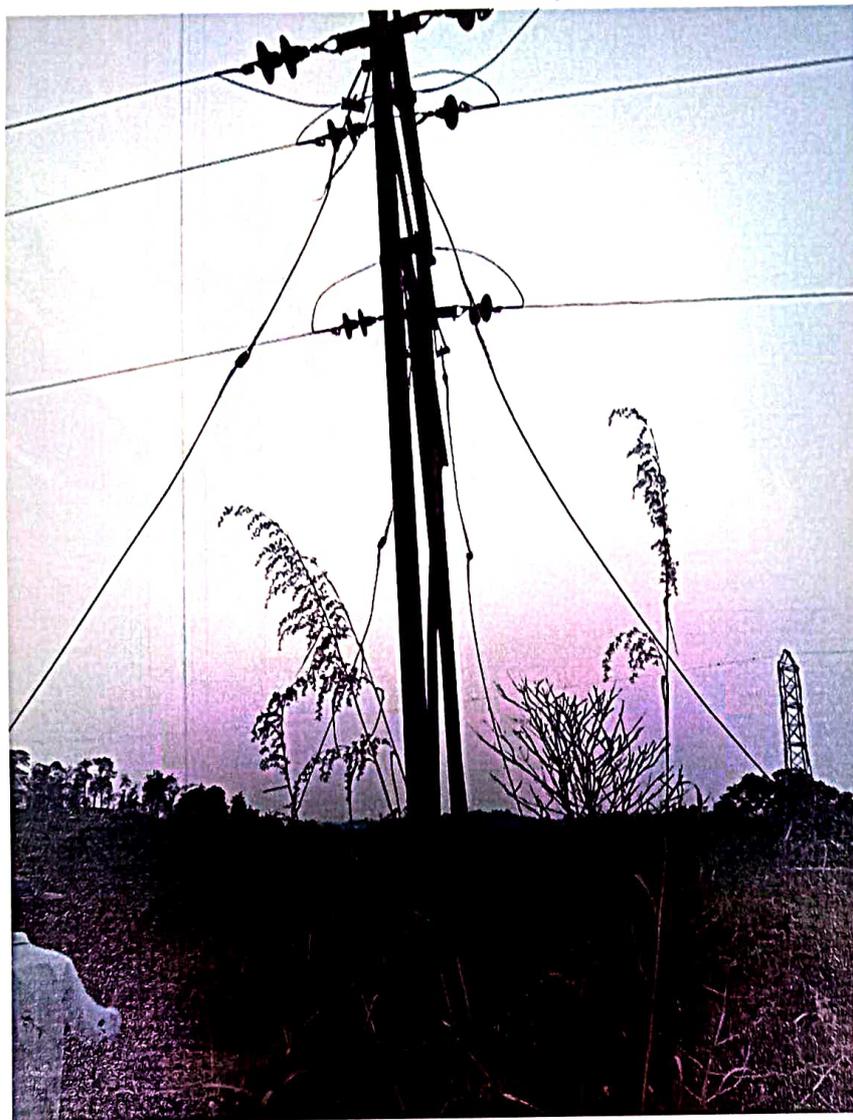
Verified at Chennai on this the 28th day of October, 2020

[Signature]
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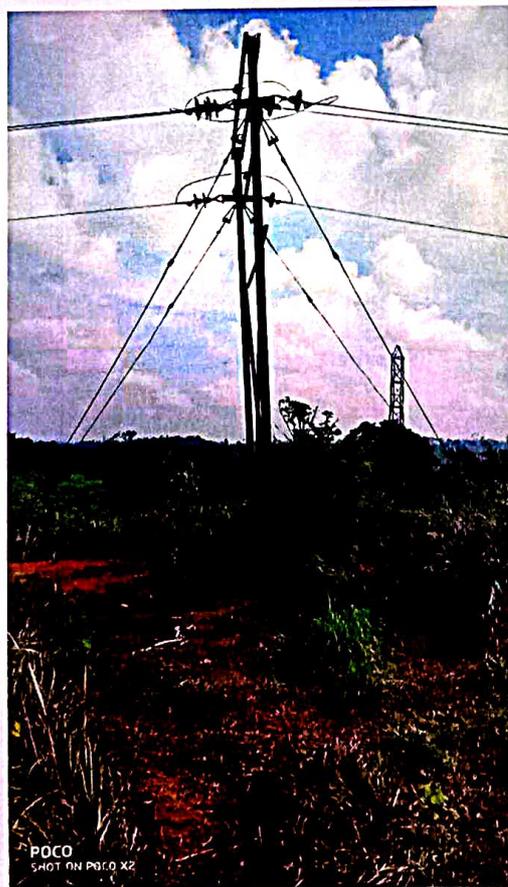
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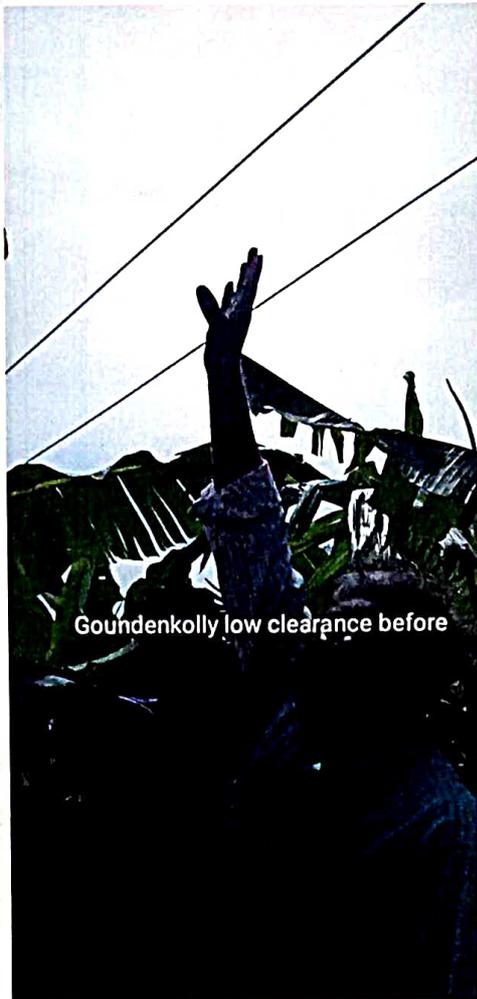
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At the Accident Spot Before



After



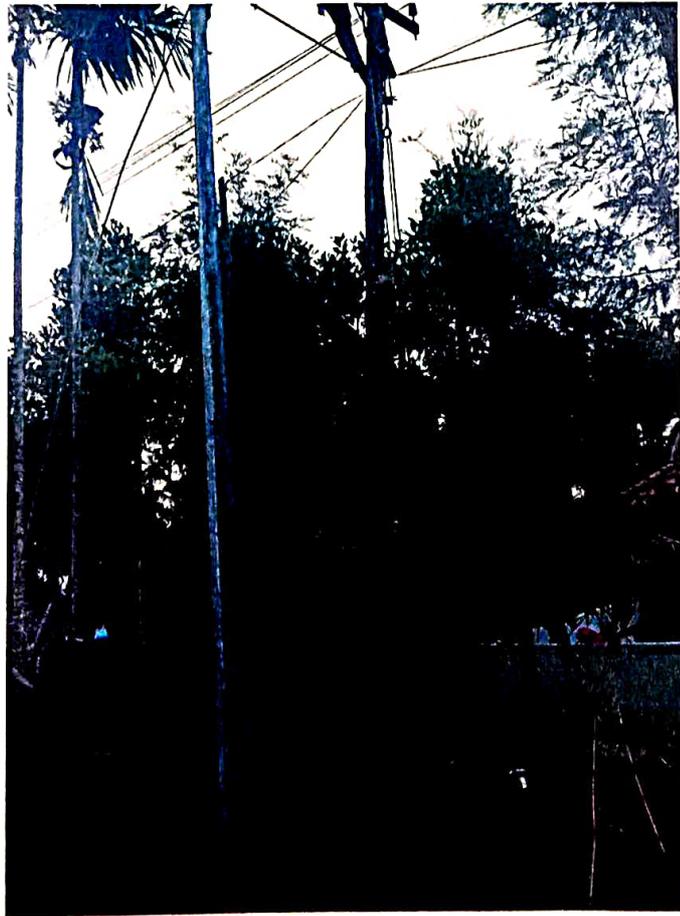


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After rectification

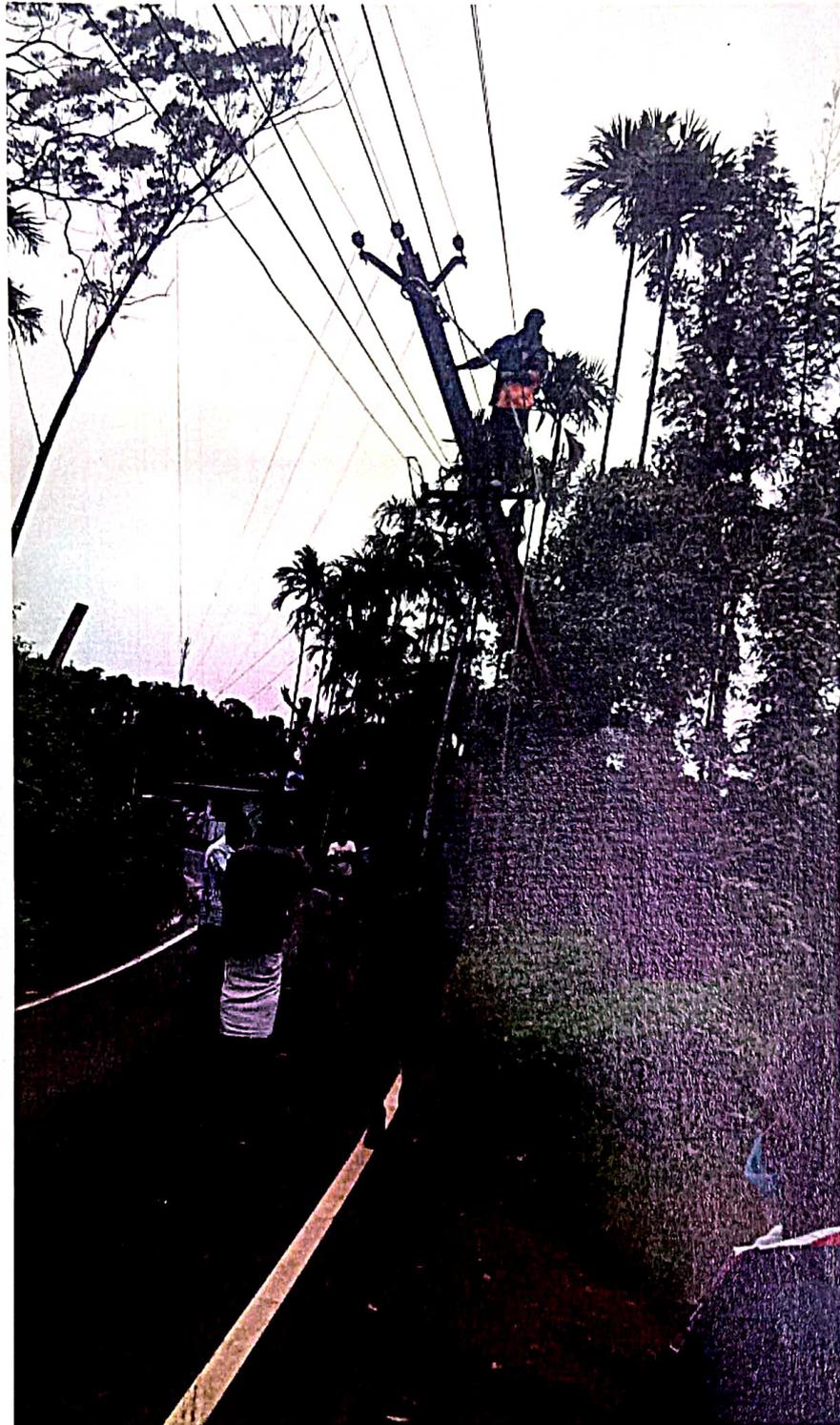


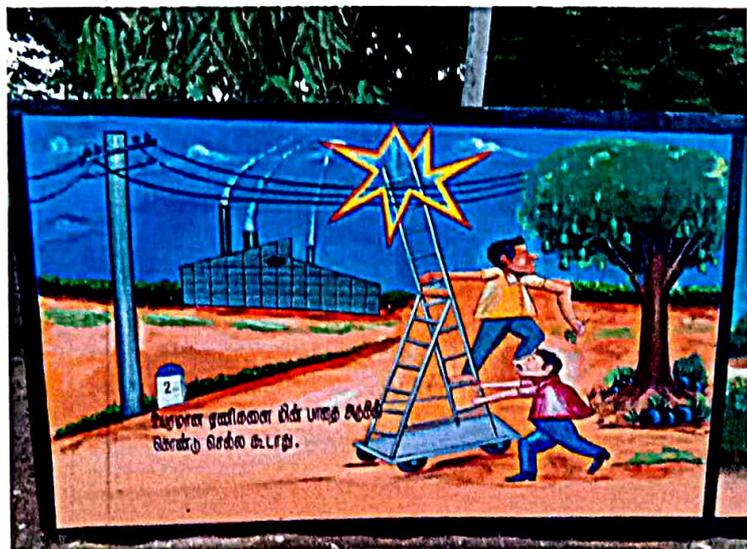
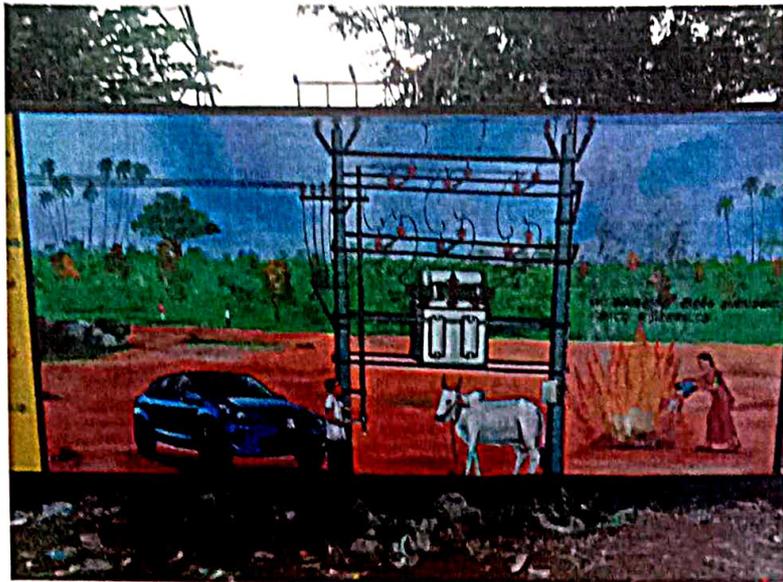
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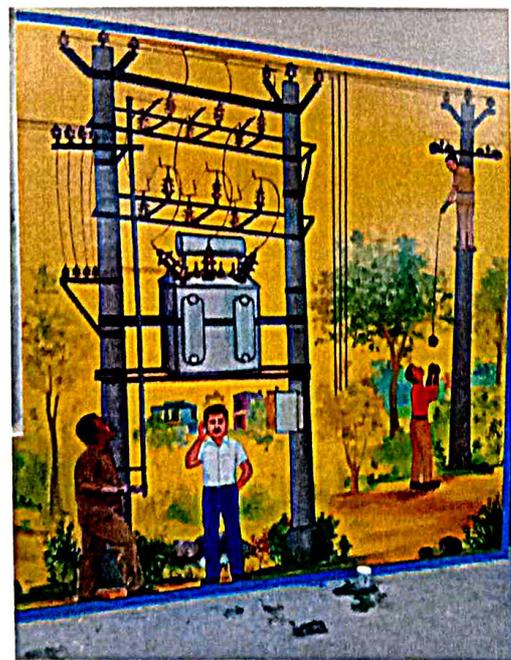
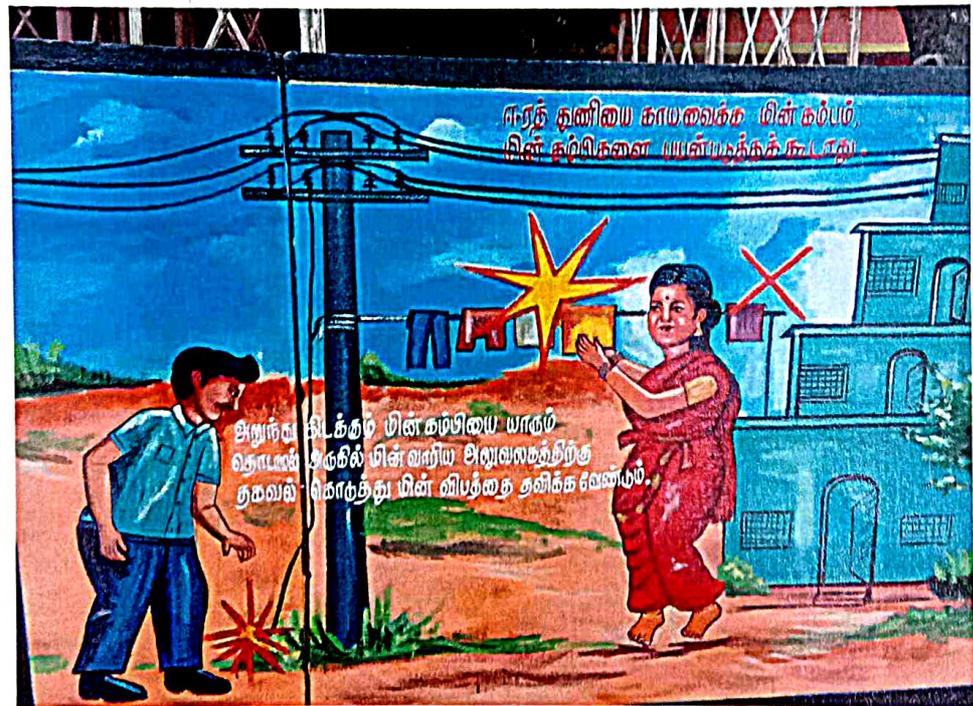


Corred Pole Replacement

Leaning Pole Replacement







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