

**KERALA STATE ELECTRICITY REGULATORY COMMISSION
THIRUVANANTHAPURAM**

Present: **Shri. Preman Dinaraj, Chairman
Adv. A.J Wilson, Member (Law)**

OP No : 71/2021

In the matter of : Petition filed for determination of Single Point
Supply tariff and its conditions of M/s Nippon Infra
Q1 Projects, Ernakulam.

Petitioner : Kerala State Electricity Board Limited (KSEBL)
KSEB Ltd represented by : Sri. Rajesh R, AEE (TRAC)

Respondent : M/s Nippon Infra Projects Pvt Ltd.
Respondent represented by: Sri. C. Cherian, Consultant.
Sri.P.C Rajan Babu, Consultant.

Date of hearing : 07.03.2022

Order dated 25.03.2022

1. M/s KSEB Ltd (herein after referred to as Petitioner) filed a petition before the Commission on 09.11.2021 with the following prayers.
 - (i) *The single point tariff applicable to M/S Nippon Infra Q1 Mall, Palarivattom, Ernakulam and sharing of electricity charges may be fixed in compliance to Regulation 56(10) of Supply Code, 2014.*
 - (ii) *The general guidelines for single point supply connection and the supplementary agreement format to be executed by the single point supply consumer with the licensee may be issued.*

2. The summary of the issues raised in the petition is given below:
 - (1) M/s Nippon Infra Projects Pvt Ltd (herein after referred as Respondent) developed a commercial complex, viz, Q1 MALL at Palarivattom. The building consists of 4,40,000 sq. ft area with 9 – floors for office spaces, 3 – lower floor for shopping and 2- floors for amenities like food court, exhibition halls, business centre etc. Two levels of parking in basement are included.
 - (2) The developer proposed to have an HT connection for common facilities and 189 LT connections with a provision for adding 25 more LT connections in future. The HT connection inclusive of lift, escalators, fire protection system, air conditioning system, water pump etc has a connected load of 2005 KW. The LT connection comes with a load of 2011 KW. Five DG sets are also proposed as standby arrangements.

- (3) The Respondent requires supply to the extent of 2967 kVA load. The connected load of HT consumer is 2005kW and the connected load of LT is 2011 kW. Q1 mall has 2 No of 2000 KVA (2 MVA) transformers, 6 No of diesel generator set (5 – 625 KVA & 1 – 500 KVA) for catering the load of the system, 2 No of capacitors (440 KVAR -2).
- (4) M/s Nippon Infra Projects Pvt Ltd submitted the application along with DPR and all the relevant details to the petitioner KSEB Ltd for availing Single Point Supply. The petitioner further submitted the following details.
- (i) M/s Nippon Infra Projects Pvt Ltd comes under the category of commercial complex. It is a multi-storeyed building with multiple beneficiaries, and is eligible for availing single point supply as per Regulation 56 of Supply Code 2014. The respondent submitted DPR as per the Regulation 56 (2) and agreed to meet the expenditure for the augmentation / up-gradation / updating of the electrical system, exclusively required for supply of electricity to the entire premises as per Regulation 56(3).
 - (ii) M/s Nippon Infra Projects Pvt Ltd has agreed to construct the internal distribution network within the project area at their cost and install sub meters as per Regulation 56(4) of Supply Code 2014. Dual register meters shall also be provided to the individual beneficiaries for getting separate readings of KSEB Ltd supply and DG supply.
 - (iii) The respondent agreed to provide ToD meters with 0.5S accuracy to all LT beneficiaries. Check meters are also proposed to be installed at different levels of distribution for energy monitoring and management.
 - (iv) The Automated energy management and billing software will be designed such that the initial billing is made with the applicable tariff for the category of the consumer and then compared for no loss/ no profit pattern with reference to the KSEB Ltd bill received for the SPS consumer. The lowest bill among two methods of bills will be served to the beneficiary consumers. The electricity duty as per orders will be collected from the respective beneficiary consumers and will be remitted to KSEB Ltd.
 - (v) The connected load and contract demand of the proposed LT consumers are given below.

Sl No	Panel name	Connected load in KW	MD	Location
1	Metering panel 1	180	78.6	L1 Ele room
2	Metering panel 2	180	78.6	L2 Ele room
3	Metering panel 3	180	78.6	L3Ele room
4	Metering panel 4	180	78.6	L4 Ele room

5	Metering panel 5	90	39.3	L5 Ele room
6	Metering panel 6A	63	27.5	L6 Ele room
7	Metering panel 6B	70.5	30.78	L6 Ele room
8	Metering panel 7A	63	27.5	L7Ele room
9	Metering panel 7B	70.5	30.78	L7 Ele room
10	Metering panel 8A	63	27.5	L08 Ele room
11	Metering panel 8B	70.5	30.78	L08 Ele room
12	Metering panel 9A	63	27.5	L09 Ele room
13	Metering panel 9B	70.5	30.78	L09 Ele room
14	Metering panel 10A	63	27.5	L10 Ele room
15	Metering panel 10B	70.5	30.78	L10 Ele room
16	Metering panel 11A	63	27.5	L11 Ele room
17	Metering panel 11B	70.5	30.78	L11 Ele room
18	Metering panel 12A	63	27.5	L12 Ele room
19	Metering panel 12B	70.5	30.78	L12 Ele room
20	Metering panel 13A	63	27.5	L13 Ele room
21	Metering panel 13B	70.5	30.78	L13 Ele room
22	Metering panel 14A	63	27.5	L14 Ele room
23	Metering panel 14B	70.5	30.78	L14 Ele room
		2011.5	878.22	

The contract demand of the HT connection is 1600 KVA. The connected load is 2005.08kW + Fire pump 225.5 kW.

- (5) KSEB Ltd also raised certain apprehension regarding the implementation of the Single Point Supply, which is extracted below.

Sl No.	Regulation	Concern/ Suggestions of KSEB Ltd
1	56(1)	<p>Multi storied buildings is not defined, According to the general meaning,</p> <ul style="list-style-type: none"> i. Multi storied building — any building having more than 1 floor ii. Complex —As per dictionary means a <u>group of buildings</u> that are <u>related</u> or a <u>large building</u> having different <u>parts</u>. Accordingly, whether any building having more than one commercial, industrial or domestic use can be termed as a complex. <p>If such an interpretation is taken, then any double storied building will be eligible for having single point connection. In order to restrict the connection to the most eligible ones (one having space constraints, to limit wastage of resources etc) it is recommended that certain other conditions may also be incorporated for being eligible to avail single point supply. The qualifying criteria may also be limited to;</p> <ul style="list-style-type: none"> i) Above a certain number of beneficiaries of same category

		<ul style="list-style-type: none"> ii) Buildings having area above a minimum area (sq mtr) iii) Above a specified total connected load iv) HT/EHT Supply v) On submission of resolution of beneficiaries demanding SPS (cases where more than 80% of the beneficiaries demands Single point supply) vi) Any combination of the above.
2	56(2)	<p>Clarification needed for the mandatory details to be submitted in the DPR since only minimum data is generally included.</p> <ul style="list-style-type: none"> I. The details of the beneficiaries including connected load, contract demand, purpose of usage, anticipated consumption etc are also needed. II. The metering details of each beneficiary along with the sketch showing how the supply is provided to the beneficiaries needs to be given by the consumer for information.
3	56(3)	<ul style="list-style-type: none"> I. It needs to be clarified on to what extent the regulation 36 is applicable. II. Further clarification is also needed as to whether the construction of internal distribution network for providing direct supply to the beneficiary by licensee shall be borne by the single point consumer or the licensee. III. If direct supply can be given only using the internal distribution network, the licensee needs to be authorized to use the internal network system in the premises. This needs to be incorporated in the agreement.
4	56(4)	<ul style="list-style-type: none"> I. Clarification on the type of meters (accuracy class, TOD etc) to be insisted for the sub meters to be provided by the developer. II. Whether dual meters with TOD facility may be insisted on sub meters for measuring KSEBL supply and generator supply separately. III. The methodology for billing the beneficiary in the case of meter being faulty and the time limit for replacing the faulty meter needs to be specified. IV. clarification on the billing methodology to be taken for clubbed space usage. ie; a single beneficiary had clubbed individual spaces for his usage and accordingly his total usage is measured in more than one meter. V. Each beneficiary needs to be measured by a single meter in order to measure the maximum demand of the beneficiary.
5	56(5)	<p>Clarification on</p> <ul style="list-style-type: none"> I. If beneficiary had remitted his payment to the SPS consumer and the SPS consumer had defaulted payment

		<ul style="list-style-type: none"> II. If a beneficiary had been given direct supply by licensee using the SPS distribution network, the same also needs to be addressed
6	56(6)	<ul style="list-style-type: none"> I. The contract demand of each licensee to be given in advance II. The energy readings of all the beneficiaries may be made available to the licensee every month in order to verify with that of the HT readings. III. Whether no profit no loss billing needs to be considered on a monthly or annually basis. IV. Misuse and theft of energy by the beneficiaries of the Single point consumer needs to be dealt with. V. The difference in the consumption of the Single point supply and the individual beneficiaries should be limited to the allowed loss (ie; any consumption above the allowed loss should be billed at the highest applicable tariff). No energy consumption should go unmetered
7	56(7)	<ul style="list-style-type: none"> I. The reconciliation of duty with respect to the beneficiary billing needs to be addressed. II. The bills issued to the individual beneficiaries by the single point consumer should not be clubbed with common charges. III. If a beneficiary has clubbed spaces for his usage thereby having his consumption from more than one meter then the methodology to arrive at his maximum demand for billing needs to be specified. IV. Whether an approved billing software needs to be incorporated for the beneficiary billing.
8	56(8)	<ul style="list-style-type: none"> I. A new beneficiary addition/ deletion which was not covered in DPR by the single point consumer. II. If a clubbed space used by a beneficiary is later divided and used by 2 beneficiaries. III. Load change or tariff change of the beneficiary. IV. It may further be clarified that whether the licensee can initiate action on finding that the details of the beneficiary had been changed from the approval given.
9	56(9)	<ul style="list-style-type: none"> I. Whether the development of internal distribution network for providing direct supply to the consumer also comes under the purview of the single point consumer. If sanction is required from the Electrical Inspectorate for the same who is to obtain sanction. II. The liberty of KSEBL to use the internal distribution network laid out by the consumer for providing direct connection needs to be ensured (needs of an agreement). III. If the Single point consumer is an LT consumer, who will be responsible for any mal operation done in the internal distribution network?
10	56(10)	<ul style="list-style-type: none"> I. The provision for providing direct supply by the licensee to the beneficiary needs to be properly addressed. If the same can be provided only through the internal network of the SPS consumer then the

		liberty of the licensee to use the network needs to be addressed. II. The construction and maintenance of internal distribution network for direct connection to the beneficiary. The sanction for the same from the appropriate authority.
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3. The Commission admitted the petition as OP 71/2021. Sri Rajesh R, AEE, TRAC presented the matter on behalf of the petitioner KSEB Ltd. Sri C. Cherian, Consultant presented the counter argument on behalf of the Respondent M/s Nippon Infra Projects Pvt Ltd. The summary of the deliberations during the hearing is as follows:

(1) M/s KSEB Ltd submitted that M/s Nippon Infra Projects Pvt Ltd is a commercial complex and comes under the category of multi-storeyed building and is eligible for availing single point supply as per Regulation 56 of Supply Code 2014. It was also submitted that, the respondent M/s Nippon Infra Projects Pvt Ltd has already presented a DPR to KSEB Ltd and has also agreed to meet the expenditure for the augmentation / up-gradation / updating of the electrical system, exclusively required for supply of electricity to the entire premises.

KSEB Ltd further submitted that the developer has a requirement of 2967 kVA power at HT. The respondent is willing to provide the single point supply to meet the load requirement of the HT consumer with a connected load of 2005kW, having 185 LT connections with a load of 2011 kW with a provision to provide 25 more LT connections.

KSEB Ltd further submitted that M/s Nippon Infra Projects Pvt Ltd has agreed to construct the internal distribution network within the project area at their cost and to provide ToD meters to individual beneficiaries.

KSEB Ltd also submitted that the automated energy management and billing software will be designed such that the initial billing is made with applicable tariff from the category of the consumer and then compared for no loss/ no profit pattern with reference to the KSEB Ltd bill received for the SPS consumer. The lowest bill among two methods of bills will be served to the beneficiary consumers. The electricity duty as per orders will be collected from the respective beneficiary consumers and will be remitted to KSEB Ltd.

KSEB Ltd also expressed certain concerns regarding the implementation of the single point supply as per Regulation 56 of the Supply Code 2014.

(2) The respondent M/s M/s Nippon Infra Projects Pvt Ltd submitted that the commercial complex Q1 MALL at Palarivattom is currently in construction stage. It is proposed to have one HT connection for common services like lift, escalators, fire protection system, air conditioning system, water pump etc which will be catering a load of 2005 KW and 189 LT connections for individual beneficiaries with a

provision for adding 25 more which comes to a load of 2011 KW.

It was further submitted that 2 No of 2 MVA transformer, 6 No of diesel generator set (5 – 625 KVA & 1 – 500 KVA) for catering the load of the system, 2 No of capacitors (440 KVAR -2) was also proposed for the building.

The respondent has also submitted the details of connected load of individual beneficiaries along with their metering arrangements to KSEB Ltd. The Respondent clarified that their contract demand would not exceed 2400kVA.

The respondent clarified that in case the contract demand or connected load exceeds 3000 kVA (limit specified for 11kV supply Voltage as per Regulation 8 of Supply Code 2014) they shall avail supply at 22kV and expressed their willingness to provide an undertaking for the same.

The respondent also clarified that they had applied for the energization approval to Electrical inspectorate and the matter is pending before the electrical inspectorate. On receiving the approval, an HT Supply Agreement shall be executed with KSEB Ltd and the same will be forwarded to the Commission.

Analysis and Decision of the Commission:

4. The Commission has carefully examined the petition filed by KSEB Ltd dated 09.11.2021, the deliberations during the hearing held on 07.03.2022, the provisions of the Electricity Act, 2003, Kerala Electricity Supply Code, 2014 and other applicable Rules and Regulations notified by the Commission, and identified the following issues for decision:

Issue 1 – Provision of single point supply:

5. In this connection, Regulation 56 of the Kerala Electricity Supply Code, 2014 provides for single point supply to the consumer and for sharing of energy charges. The relevant Regulation is extracted below for ready reference:

“56. Single point supply and sharing of electricity charges. - (1) The licensee may give single point supply to the following premises with multiple beneficiaries subject to the conditions specified in the sub regulations hereunder: -

(i) multi-storeyed buildings;

(ii) colony developed by any development authority or private builder or promoter or developer;

(iii) domestic, commercial or industrial complex;

(iv) residential complex constructed by any employer for his employees or by a panchayat or a cooperative society or a registered association of beneficiaries.

(2) The development authority or promoter or builder or developer or panchayat or cooperative society or registered association of beneficiaries shall submit an

application to the licensee for availing single point supply with a detailed project report (DPR) on the scheme for giving supply to all beneficiaries and such other necessary particulars.

(3) The development authority or promoter or builder or developer or panchayat or cooperative society or registered association of beneficiaries shall bear the expenditure for the augmentation or upgradation or uprating of the distribution system, exclusively required for the supply of electricity to the entire premises included in the detailed project report (DPR) and shall also construct at his cost the internal distribution network within the project area as per the standards and specifications stipulated in this Code.

Provided that the expenditure to be borne by the development authority or promoter or builder or developer or panchayat or cooperative society or registered association of beneficiaries shall be governed by the relevant provisions in Regulation 36.

(4) Supply may be provided by the development authority or promoter or builder or developer or panchayat or cooperative society or registered association of beneficiaries to the individual beneficiaries and for common service by installing sub-meters.

(5) The development authority or promoter or builder or developer or panchayat or cooperative society or registered association of beneficiaries shall remit the charges for the entire electricity availed at such single point of supply as per the bill preferred by the licensee within such time as indicated in the bill.

(6) The development authority or promoter or builder or developer or panchayat or cooperative society or registered association of beneficiaries shall collect, on a no profit no loss basis, the cost of energy consumed by individual beneficiaries.

(7) The tariff charged from the individual beneficiaries shall under no circumstances exceed the tariff specified by the Commission for the respective category of consumers.

(8) Providing of connection to individual beneficiaries in such premises with multiple consumers and sharing of expenses of consumption of electricity as per the above provisions shall not be construed as unauthorized extension of supply or resale of energy.

(9) The maintenance of internal distribution network and providing services to individual beneficiaries shall be the responsibility of the development authority or promoter or builder or developer or panchayat or cooperative society or registered association of beneficiaries.

(10) The tariff applicable to the single point supply shall be as determined by the Commission: Provided that the provisions of this regulation shall not in any way affect the right of a person residing in the housing unit sold or leased by such development authority or promoter or builder or developer or panchayat or cooperative society or registered association of beneficiaries, to demand supply of electricity directly from the distribution licensee of the area.

6. In this connection, the Commission noted that as per the petition, M/s Nippon Infra Projects Pvt Ltd is developing a commercial complex, viz, Q1 MALL at Palarivattom. The building consists of 4,40,000 sq. ft area with 9 – floors for office spaces, 3 – lower floor for shopping and 2- floors for amenities like food court, exhibition halls, business centre etc. Two levels of parking in basement are included. As per the building plan, the developer is proposing to have one

HT connection for common loads such as lift, escalators, fire protection system, air conditioning etc. The developer it is also creating facilities for providing electricity connections to 189 LT consumers, with a provision to provide 25 more connections. The connected load of the HT connection is expected to be 2005kW and LT connection at 2011 kW.

7. The total load requirement from KSEB Ltd is estimated at 2967 kVA. Hence, the developer has proposed to have 11 kV supply from KSEB Ltd. The respondent clarified during the deliberations that, in case the contract demand exceeds 3000 kVA, the limit specified for 11kV supply Voltage as per Regulation 8 of Supply Code 2014, the respondent shall avail supply at 22kV or above and expressed their willingness to provide an undertaking for the same.
8. The above facts reveal that:
 - (1) According to the present petition, the consumer has estimated the connected load for the HT and LT consumers at 4016 kW. Further, the contract demand is anticipated as 2967 kVA. Hence, as per the Supply code provision, the licensee, KSEB Ltd can provide single point supply at 11 KV voltage level to the consumer based on the anticipated contract demand. However, during the hearing, the respondent Nippon infra projects Private Limited clarified that they do not expect their contract demand to exceed 2400 kVA. Further, the respondent is also proposing to install 2 No of two MVA transformers i.e. 4 MvA and 5 No of diesel generating sets having capacity of 6 2 5 kVA (3125 kVA) and 1DG set of 500 kVA totalling 3625 kVA.
 - (2) The above facts reveal that the respondent themselves are not clear about the actual load requirement of their customers. Though they had mentioned the contract demand as 2967 kVA, they are also anticipating the addition of 25 more customers. Hence, it is not clear whether the supply code upper limit of 3MVA load would be exceeded or otherwise. At present, it appears to be a touch and go affair. The consumer has submitted that in case their contract demand exceeds the 3 MVA limit, they would be willing to avail supply at 22 KV or above voltage level. The commission noted that supply at 22 KV is not available at the consumers electricity circle and therefore the next higher voltage level of 33 KV would apply.
 - (3) Further, in such a scenario wherein the project is still in the construction phase, logically the respondent must firm up their actual load requirement and make appropriate load provisions, rather than try to retrofit at a later stage. Apart from the additional costs involved in such retrofits, the possibility of the respondent approaching the commission seeking a relaxation of the supply code provision cannot be ruled out. **Hence, the Commission hereby directs that the respondent Nippon Infra Projects Private Limited must firm up their load requirements first and only then approach KSEB Ltd.**

Issue 2- Energisation clearance from the Electrical Inspectorate:

9. During the hearing, the respondent clarified that they had applied for the energization approval to the Electrical inspectorate and the matter is still pending there. On receiving the approval for energization from the Electrical Inspectorate, an HT Supply Agreement shall be executed with KSEB Ltd and the same will be forwarded to the Commission. Hence, it is clear that both the petitioner as well as the respondent has approached this commission prematurely. ***Under such circumstances, the Commission is not inclined to consider the petition at present and therefore hereby directs that if the petitioner desires to provide single point supply to the respondent, they can approach this Commission only after the project is completed and energization clearance is received from the Electrical Inspectorate.***

Issue 3 – Billing:

10. The Commission notes that M/s Nippon Infra Projects Pvt Ltd has agreed to construct the internal distribution network within the project area at their cost and to install sub meters as per Regulation 56(4) of Supply Code 2014. Dual register meters shall also be provided to the individual beneficiaries for getting separate readings of KSEB Ltd supply and DG supply. In addition, the respondent agreed to provide ToD meters with 0.5S accuracy to all LT beneficiaries. Check meters are also proposed to be installed at different levels of distribution for energy monitoring and management.
11. In order to collect the energy charges from the individual customers of the respondent, they clarified that Automated energy management and billing software will be designed. In this system, the initial billing will be made with the tariff applicable for the consumer category. Thereafter, this bill will be compared with the KSEB Ltd bill received for the SPS consumer. The lowest bill among two methods of bills will be served to the beneficiary consumers, so that the final billing issued to the respondent's consumers will be on a no loss/ no profit basis. The Electricity Duty as per orders will be collected from the respective beneficiary consumers and will be remitted to KSEB Ltd.
12. The Commission examined this issue in detail. The Commission noted that in Petition No. OP No. 08/2021, Order dated 17.03.2022, the Commission has already approved the manner of billing in the case of single point supply. The relevant portion of the Commission's Order is reproduced below:

"The second concern raised by KSEB Ltd is regarding the provision 56(6) of Supply Code 2014, to implement the scheme on no profit no loss basis. The Commission examined the issue in detail and hereby orders the following:

- (i) *The complainant is permitted to raise the bills to individual beneficiaries at the prevalent tariff category specified in the tariff schedule notified by the Commission from time to time. The tariff shall be assigned strictly*

as per the purpose of usage and the developer can seek the assistance of KSEB Ltd for assigning the tariff to the beneficiaries, if required.

- (ii) The developer shall maintain records of the monthly demand, energy consumption, tariff collected from the beneficiaries and other relevant details. A consolidated report of the same shall be submitted to KSEB Ltd within one month, after the end of each financial year. The developer shall also remit any excess amount collected from the individual beneficiaries in excess of the HT bill raised by KSEB Ltd during the financial year. The excess amount shall also be remitted within one month from the end of the financial year.
- (iii) The developer shall strictly follow the above directions otherwise, the Commission may disallow the developer from implementing Single Point Supply Scheme.”

13. Since the Commission has already approved the building methodology, the commission finds no reason to depart from this procedure. Further, the commercial building being developed by the respondent is still under construction. As per the provisions of the EA-2003, the Electrical Inspectorate is empowered to improve the safety aspects of the electrical installation of such high-rise buildings like that of the petitioner. However, as mentioned earlier, the respondent is yet to get the approval for the energization of the building from the Electrical Inspectorate as per the provisions of the EA-2003 and Kerala Electricity Supply Code 2014. Only after the completion of the building and energization approval from the Electrical Inspectorate can the respondent approach KSEB Ltd for availing Single Point Supply as per the Regulation 56 of the Supply Code 2014.

Under such circumstances, the commission hereby orders that as and when the respondents project is complete in all respects and KSEB Ltd, the petitioner is ready to file the petition before this commission for approval of single point supply, this methodology of building shall also be adopted in this case also.

Issue 4 – Clarifications sort by KSEB Ltd:

14. The Commission has noted that KSEB Ltd, the petitioner has raised various other issues which are mentioned in paragraph 2(5) of this Order. These issues deal with the implementation of the Single Point Supply as per the Regulations 56 of the Kerala Electricity Supply Code, 2014.

The Commission examined the issues raised by the KSEB Ltd in detail and arrived at the conclusion that the same can only be addressed by amending Regulation 56 of the Supply Code 2014, after following the due procedure. Hence, KSEB Ltd if they so desire can file a separate petition for amending the Regulation 56 of the Supply Code, 2014.

Considering these facts in details, the Commission has arrived at the conclusion that, the present application filed by the respondent before

KSEB Ltd for availing Single Point Supply is premature. The Commission also cannot grant approval for providing Single Point Supply to the building of the respondent based on the present petition filed by KSEB Ltd. Hence, the present petition is liable to be rejected and hence rejected.

However, after the completion of the building and energization approval from the Electrical Inspectorate, the respondent M/s Nippon Infra Q1 Ltd is at liberty to approach the petitioner KSEB Ltd for availing Single Point Supply as per the Regulation 56 of the Supply Code 2014, with all relevant documents. Thereafter, KSEB Ltd shall file a fresh petition for the determination of the Single Point Supply Tariff and for approval of the terms and conditions for providing single point supply. The Commission has also decided to exempt KSEB Ltd from payment of petition fee for the petition to be filed, based on the directions in the present order.

Order of the Commission

15. The Commission after examining the petition filed by M/s KSEB Ltd, deliberations and arguments presented by both parties during the hearing held on 07.03.2022, and other facts submitted to the Commission during the proceedings of the subject matter, as per the provisions of EA-2003, hereby rejects the petition dated 09.11.2021 due to the reasons as explained in the preceding paragraphs. The other instructions and directions given in paragraphs 8(3), 9, 13 and 14 above shall also be strictly adhered to.

Petition disposed. Ordered accordingly.

**Sd/-
Adv. A J Wilson
Member (Law)**

**Sd/-
Preman Dinaraj
Chairman**

Approved for issue

C R Satheeshchandran
Secretary