



- (ii) Sri. Sankara Complex is a building at the premises of Vadakke Madham Brahmaswam, consist of an eight storied Mall (Five floors completed), SreeSankaraKalyanamandapam and a Residential Vedic Institution.

SreeSankara Mall is a newly constructed five storied building and is proposed to be expanded to a eight story building.

The total area of the proposed building is 13611.92 M<sup>2</sup> and the completed area is 8,618.80M<sup>2</sup>. Two floors of the building are for car parking and other floors are to be let out on rent.

There is a two storied Kalyanamandapam “SreeSankara Hall” in that compound having a total area of 2120.54 M<sup>2</sup>. A residential Vedic Institution is also functioning therein, with an area of 1371M<sup>2</sup>. The electricity connection is for the functioning of all these buildings.

3. Vadakke Madham Brahmaswam is designed for an electrical connected load of 880.75 KW + 95.5KW Fire Pump + 500 KVAR Capacitor. The Chief Electrical Inspector granted approval for this load on 06.04.2017. The electrical installation consists of 1000 KVA Transformer and a 320 KVA Generator has been installed and sanction obtained from the Electrical Inspectorate, Thrissur. At present the connected load is 312.84KW + 82.06 KW (110 H.P) Fire Pump + 250 KVAR + 14.49 KW Lift.

Vadakke Madham Brahmaswam has requested the licensee M/s TCED to provide power supply to their premises as per the clause 56 of the Kerala Electricity Supply Code 2014, for the following beneficiaries in their premises:

Door No.	Connections to	Connected Load in KW	Beneficiaries Purpose	Remarks
554/2	The Vice President, M/s. Vadakke Madham Brahmaswam, M.G. Road, Thrissur	34.05	Kalyana Mandapam	Energization Sanction obtained
554/3, 554/6		256.91	Trade in Branded Garments / Shoe	Energization Sanction obtained
554/3 to 7		21.88 KW + 14.494 KW Lift	Common utility	Energization Sanction obtained
554/4, 554/5			Bank	In the Process of getting sanction
554/7			Finance	In the Process of getting sanction

Further, M/s. Vadakke Madham Brahmaswam also requested M/s TCED to provide connection, in future as and when letting out of the remaining space in the commercial shopping complex. They have proposed 10 more connections in the present completed area of the Commercial Complex.

4. M/s. TCED further submitted the following.
  - (i) As per the Regulation 56 (10) of Kerala Electricity Supply Code 2014, approval of the Commission is required for the determination of “tariff applicable to the single point supply”.
  - (ii) The Vadakke Madham Brahmaswam has complied with Regulation 56(3) of the Supply Code 2014, and met the expenditure for the augmentation / up-gradation / updating of the electrical system, exclusively required for supply of electricity to the entire premises. The developer has also constructed the internal distribution network within the project area at their cost, as per the standards and specifications stipulated in Supply Code, 2014.
  - (iii) M/s Vadakke Madham Brahmaswam has provided supply to the individual beneficiaries and for common services by installing sub meters as per Regulation 56(4) of Supply Code 2014.
  - (iv) M/s Vadakke Madham Brahmaswam has also agreed to remit the charges for the entire electricity availed at such single point of supply as per the bill preferred by M/s TCED within such time as per Regulation 56(5) of Supply Code 2014.
  - (v) M/s Vadakke Madham Brahmaswam also agreed that they will collect the cost of energy consumed by individual beneficiaries on a no profit no loss basis, as per Regulation 56(6) of Supply Code 2014.
  - (vi) M/s Vadakke Madham Brahmaswam has agreed to comply with Regulation 56(6) of Supply Code 2014, that the tariff charged from the individual beneficiaries shall under no circumstances exceed the tariff specified by the Commission for the respective category of consumers.
  - (vii) The maintenance of internal distribution network and providing services to individual beneficiaries will be the responsibility of M/s Vadakke Madham Brahmaswam.
5. The Commission admitted the petition as OP No. 01/2020 and conducted hearing on the petition at Trichur on 24.01.2020. During the hearing, Sri. T.S Jose and the Administrator, M/s Vadakke Madham Brahmaswam presented

the petition on behalf of the petitioner M/s TCED and the respondent M/s Vadakke Madham Brahaswam. Sri. G. Manoj, Asst: Executive Engineer, KSEB Ltd, presented the comments of KSEB Ltd. During the deliberations, the petitioner M/s TCED and the developer submitted that, the developer intended to avail single point supply from the licensee M/s TCED as provided under Regulation 56 of the Supply Code, 2014 and to provide electricity to individual beneficiaries within the premise of the developer at the retail tariff approved by the Commission from time to time. The developer at his cost has created necessary internal electrical distribution system within their premises at their cost. At present the developer has an HT connection in the commercial category.

6. Based on the deliberations during the hearing, the Commission directed the petitioner to submit the details of the beneficiaries of M/s Vadakke Madham Brahaswam, including their connected load, contract demand, estimated monthly consumption, purpose of usage etc.

In compliance of the direction of the Commission, the petitioner vide the letter dated 23.03.2020 submitted the following details before the Commission.

Sl No	Name of Beneficiary	Occupancy area	Connected load	Contract demand	Approx. monthly consumption	Purpose
		(m2)	(kW)	(kVA)	(kWh)	
1	M/s Vadakke Madham Brahaswam	2170	34.05	20	2000	Kalyanamandapam
2	M/s Vadakke Madham Brahaswam	3376	36.37	20	1500	Common Use
3	M/s Future Lifestyle Fashion Ltd (Brand factory)	2400	256.91	125	28000	Trade in branded garments/ shoe
4	M/s C S B Bank Ltd	270	35.30	20	3500	Bank
5	M/s Sundharam Finance	140	13.41	8	900	Finance
	Total	8356	376.044	193	35900	

#### **Analysis and Decision of the Commission:**

7. The Commission has examined in detail the petition filed by M/s TCED for providing single point supply to M/s Vadakke Madham Brahaswam, as per the provisions of the Electricity Act, 2003 and the Regulations notified by the Commission consistent with the Electricity Act, 2003.

8. The Commission examined in detail the petition filed by M/s TCED to provide Single point supply to M/s Vadakke Madham Brahmaswam, and noted the following.

(1) M/s Vadakke Madham Brahmaswam, is a traditional vedic institution at Thrissur, close to the Vadakkumnathan Temple. The following buildings are existing / under construction at the premises of the Vadakke Madham Brahmaswam.

(i) Sree Sankara Kalyanamandapam (existing) having a total area of 2120.54 m<sup>2</sup>.

(ii) A Residential Vedic Institution (existing) with a total area of 1371 m<sup>2</sup>.

(iii) Sree Sankara Mall (under construction), an eight storied building with a total area of 13611.92 m<sup>2</sup>. Out of it, the construction of five stories with a total area of 8618.80 m<sup>2</sup> is completed.

M/s Vadakke Madham Brahmaswam proposed to avail Single Point Supply, and provide electricity supply to each of the beneficiaries within the Sri Sankara Mall as per the provisions in the Supply Code, 2014.

(2) The developer M/s Vadakke Madham Brahmaswam already installed 1000 kVA transformer and 320 kVA generator, and obtained sanction from the Electrical Inspector vide the order dated 12.11.2018. Further, the Electrical Inspector, Thrissur vide the energization order dated 14.06.2019 enhanced the present connected load of the building is 312.84 kW + 110 HP Fire Pump+ 250 kVAR Capacitor + 14.49 kW lift, i.e., the total sanctioned connected load of all installation is 647kW.

The total sanctioned is about 68% of the capacity of the transformer installed.

(3) At present M/s Vadakke Madham Brahmaswam has availed power supply at HT with a contract demand of 50 kVA under HT-IV commercial tariff, from the petitioner M/s TCED.

(4) M/s Vadakke Madham Brahmaswam proposes to avail single point supply to provide power supply to the following beneficiaries in the buildings within their premises.

Sl No	Purpose	Area (m2)	Connected load (kW)	Contract demand (kVA)	Annual consumption (expected) (kWh)	Purpose of usage
1	Kalyanamandapam	2170	34.05	20	2000	Commercial
2	Common use	3376	36.37	20	1500	Commercial
3	Brand factory Shop	2400	256.91	125	28000	Commercial
4	CSK Bank Ltd	270	35.30	20	3500	Bank/ finance
5	Sundharam Finance	140	13.41	8	900	
	Total	8356	376.04	193	35900	

9. The petitioner M/s TCED submitted that, M/s Vadakke Madham Brahaswam, the developer have complied with Regulation 56(3) of Supply Code 2014 and met the expenditure for the augmentation / up gradation / updating of the distribution system, exclusively required for supply of electricity to the entire premises. The developer also constructed the internal distribution network within the project area at their cost as per the standards and specifications stipulated in Supply Code 2014. The developer also installed sub meters as per Regulation 56(4) of Supply Code 2014 for providing supply to individual consumers.

The developer has agreed to remit the charges for entire electricity availed at such single point of supply as per the bill preferred by the Thrissur Corporation Electricity Department. The developer also agreed that, they will collect the cost of energy consumed by individual beneficiaries on a no profit no loss basis, as per Regulation 56(6) of Supply Code 2014 and also agreed that the tariff charged from the individual beneficiaries shall at no circumstances exceed the tariff specified by the Commission for respective category of consumers.

The petitioner TCED also submitted that, the maintenance of internal distribution net work and providing services to individual beneficiaries will be the responsibility of the developer M/s Vadakke Madham Brahaswam.

10. The Commission noted that, the total area of the buildings at the premises of the developer M/s VadakkeMadhamBrahaswam is about 17000 m2 as detailed below.

Sl No	Particulars	Area (m2)
1	Kalyanamandapam (existing)	2120.5
2	Residential Vedic Institute (existing)	1371.0
3	SreeSankara Mall (Under construction)	13611.9
	Total	17103.5

11. The area presently occupied/ allotted to different beneficiaries for different purposes are given under paragraph 8(4) above, and noted that out of the 17103.5 sq.meter of the buildings in their premises, the developer could identify the beneficiaries for 8356 sq.m only.
12. **Based on the petition and other issues raised during the hearing, the Commission has identified the following issues for detailed examination.**
- (1) **Whether the Commission is required to permit the licensee M/s TCED to give single point supply to the developer M/s Vadakke Madham Bramaswam?.**
  - (2) **Whether the developer can give LT supply to a beneficiary having connected load of 256.91 kW and contract demand of 125 kVA in their shopping mall?**
  - (3) **What will be the retail tariff applicable to the individual beneficiaries of the developer?**
  - (4) **What is the single point tariff applicable to the developer M/s Vadakke Madham Brahmaswam.?**

Detailed appraisal on the each issue identified by the Commission is given below.

**Issue No.1**

**Whether the Commission is required to permit the licensee, M/s TCED to give single point supply to the developer M/s Vadakke Madham Bramaswam?**

13. Regulation 56 of the Supply Code, 2014, deals with 'Single point Supply', which 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 co-operative 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 unauthorised 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.*

**14.** As extracted above, Regulation 56 of the Supply Code, 2014, authorize the distribution licensees to give 'single point supply' to the premises of the multi-storied buildings, colonies etc. developed by private promoters, with multiple beneficiaries, subject to the following.

- (i) The developer has to 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 the beneficiaries in the premises of the developer.
- (ii) The developer 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 DPR and also construct at his cost the internal distribution network.
- (iii) The developer has to provide supply to the individual beneficiaries and for common services by installing sub-meters.
- (iv) The developer shall remit the electricity charges for the electricity availed at single point supply as per the bill preferred by the licensee within the time limit specified in the bill.
- (v) The developer shall collect the cost of energy consumed by the individual beneficiaries on a 'no profit no loss' basis.
- (vi) The tariff assigned to the individual beneficiaries shall under no circumstances exceed the tariff specified by the Commission for the respective category of consumers.
- (vii) The maintenance of the internal distribution network and providing services to individual beneficiaries shall be the responsibility of the developer.

(viii) The tariff applicable to the single point supply shall be as determined by the Commission.

15. As pointed out above, as per the Regulation 56 of the Supply Code, 2014, the distribution licensee is authorized to provide single point supply to the developer of a multi-storied buildings, colonies etc. after verifying the DPR and subject to other conditions specified under Regulation 56 of the Supply Code, 2014. Before providing single point supply to the developer, it is the responsibility of the distribution licensee to verify that, the developer has fully complied with the conditions specified in the Supply Code, 2014.

**Since there is no relevance in the relief sought by the petitioner to allow them to provide Single Point Supply to Vadakke Madham Brahmaswam, the relief sought by the petitioner is rejected. However, as per the Regulation 56 of the Supply Code, 2014, the licensee M/s TCED, after verifying the documents including the DPR, physical verifications of the facilities created by the developer under Regulation 56(2), 56(3) and 56(4) of the Supply Code, 2014, and after entering into necessary agreements with the developer, may provide single point supply to the developer.**

**Issue No.2.**

**Whether the developer can give LT supply to a beneficiary having connected load of 256.91 kW and contract demand of 125 kVA in their shopping mall?**

16. M/s Vadakke Madham Brahmaswam proposes to avail single point supply to provide power supply to the following beneficiaries in the buildings within their premises.

Sl No	Purpose	Area (m2)	Connected load (kW)	Contract demand (kVA)	Annual consumption (expected) (kWh)	Purpose of usage
1	Kalyanamandapam	2170	34.05	20	2000	Commercial
2	Common use	3376	36.37	20	1500	Commercial
3	Brand factory Shop	2400	256.91	125	28000	Commercial
4	CSK Bank Ltd	270	35.30	20	3500	Bank/ finance
5	Sundharam Finance	140	13.41	8	900	
	Total	8356	376.04	193	35900	

17. As per the details submitted before the Commission, the connected load of the beneficiary 'Brand factory shop' is 256.91 kW and its contract demand is

125 kVA. The Commission noted that, neither the licensee TCED nor the developer M/s Vadakke Madham Brahmaswam have specified the voltage level at which electricity supply will be given to individual beneficiaries including the beneficiary 'Brand Factory shop'.

Since the developer proposed to avail the single point supply at HT, due to the safety and other reasons, the supply to all the individual beneficiaries shall be provide at LT, strictly complying with the provisions of the Supply Code, and with the prior approval from the Electrical Inspectorate.

18. The beneficiary 'Brand Factory shop' is located in the eight storied shopping mall of the developer M/s Vadakke Madham Brahmaswam. As per the details submitted by the developer, the connected load of the 'Brand Factory shop' is 256.91kW and its contract demand is 125 kW. Regulation 11(3) of the Supply Code, 2014 deals with the provision regarding providing supply to an applicant occupying multi-storied buildings, even if his connected load or contract demand is more than 100 kVA. The relevant Regulation is extracted below.

"11(3) An applicant occupying multi-storeyed building may be given service connection at low tension on his application, even if his connected load or contract demand is more than 100 kVA, by providing bus ducts or cables of adequate current carrying capacity and complying with the provisions of the Central Electricity Authority (Measures Relating to Safety and Electric Supply) Regulations, 2010, provided the developer or builder of the multistoreyed building, installs and maintains at his cost, the transformer station of adequate capacity and associated apparatus including the internal distribution system for this purpose and enhances the capacity of the transformer to meet the load growth if any."

**Hence, the licensee and the developer can provide supply to the 'Brand factory shop' at LT, strictly in compliance of the Regulation 11(3) of the Supply Code, 2014. The licensee M/s TCED shall ensure the compliance of the same.**

### **Issue No.3.**

**Retail tariff applicable to the individual beneficiaries of the developer M/s Vadakke Madham Brahmaswam.**

19. As per the Regulation 56(6) of the Supply Code, 2014, the developer shall collect the cost of energy consumed by the individual beneficiaries on a 'no profit no loss basis.

Further as per the Regulation 56(7) of the Supply Code, 2014, the tariff charged from the individual beneficiaries shall under no circumstances

exceed the tariff specified by the Commission for the respective category of consumers.

20. As detailed under paragraph 16 above, at present the developer has identified five beneficiaries within their premises. Out of the five, three beneficiaries avail electricity supply for commercial use and two beneficiaries under bank/ financial institutions category.
21. Till date, the Commission has been approving category wise uniform retail tariff across the State, irrespective of the geography, demography and the licensee who provide supply to the consumer. Considering these aspects in detail, the Commission hereby order that, individual beneficiaries shall be charged at the retail tariff approved by the Commission from time to time based on their categories, as detailed below.
- (a) The Kalyanamandapam, Brand factory shop and common use shall be charged at LT-VII(A) Commercial tariff, and
- (b) Bank and Sundharam Finance shall be charged at LT-VI(C) tariff.
22. The Commission further clarify that, the electricity to the individual beneficiaries shall be provided only through a correct submeter installed by the developer in compliance of the Regulation 56(4) of the Supply Code, 2014. The bills shall be raised to the individual consumers strictly on the basis of the readings of the submeter.

#### **Issue No.4**

**What is the single point tariff applicable to the developer M/s Vadakke Madham Brahmaswam.?**

23. As per the Regulation 56(10) of the Supply Code, 2014, the Commission has to determine the tariff applicable to the single point supply. Based on the details of the connected load and monthly consumption of the individual beneficiaries, the monthly electricity charge receivable from the beneficiaries as per the prevailing tariff is estimated below.

Beneficiary	Connected load	Contract demand	Monthly consumption	Fixed charge/ Demand Charge		Energy charge		Total amount (Rs)
	(kW)	(kVA)	(Units)	Rate (Rs /kW or Rs/ kVA) per month	Amount (Rs)	Rate (Rs/ kWh)	Amount (Rs)	
Kalyanaman dapam	34.05	20	2000	140	4767	9.30	18600	23367
Common use	36.37	20	1500	140	5092	9.30	13950	19042
Shop	256.91	125	28000	220	27500	9.30	260400	287900
Bank	35.30	20	3500	180	6354	8.50	29750	36104
Finance	13.41	8	900	180	2414	8.50	7650	10064
<b>Total</b>	<b>376.04</b>	<b>193</b>	<b>35900</b>		<b>46127</b>		<b>330350</b>	<b>376477</b>

- (1) As per the Regulation 56(6) of the Supply Code, developer shall collect the electricity charge from the individual beneficiaries at no profit no loss basis. Hence the entire electricity charges collected from the individual beneficiaries has to be passed on to the licensee at the single point tariff.
- (2) The single point tariff at HT payable by the developer to the licensee also consists two parts, (a) Demand Charge and (b) Energy Charge.
- (3) As per the prevailing practice, about 25% of the electricity tariff is proposed to be recovered through 'Demand Charge @Rs/ kVA basis' and balance 75% is proposed to be recovered through 'Energy charge @ Rs/unit basis). Accordingly, the 'Single Point Tariff' applicable to the developer 'M/s Vadakke Madham Brahmaswam' is provisionally determined as follows.

Sl no	Particulars		
1	Total monthly electricity charge expected from individual beneficiaries	(Rs)	376477
2	Demand Charge (Rs/ kVA/month)		
	(i) Proportion of total electricity charge proposed to recover through Demand Charge		25%
	(ii) Contract demand for single point supply (10% excess over total contract demand of individual beneficiaries)	(kVA)	212
	Demand Charge	(Rs/ kVA/ month)	443
	(Rounded off to)	(Rs/ kVA/ month)	<b>450</b>
2	Energy charge (Rs/unit)		
	(i) Proportion of total electricity charge proposed to recover through Energy Charge		75%
	(ii) Monthly consumption	(kWh)	35900
	(iii) Energy charge	(Rs/kWh)	7.87
	(Rounded off to)	(Rs/kWh)	7.90

24. The summary of the 'Single Point Tariff' applicable to the developer M/s Vadakke Madham Brahmaswam is given below.

### Single point tariff applicable to Vadakke Madham Brahamaswam

Particulars	
Demand charge (Rs/kVA/month)	450
Energy charge (Rs/unit)	7.90

The above tariff is provisionally applicable for a period of one year from date of this order. Within one month after completion of one year, the licensee shall, file a proper petition with complete details of the individual beneficiaries of the developer exists then. The details to be provided by the developer include the details of the individual beneficiaries such as purpose and usage, 'connected load', 'contract demand', 'actual monthly consumption', month wise details of the electricity charges collected from each individual beneficiaries and also the month wise details of the single point tariff paid by the developer to the licensee during the last one year from the date of this order, to enable the Commission to re-determine, if required, the single point tariff, for the periods beyond one year from date of this order.

### **Orders of the Commission**

25. The Commission, after examining the petition filed by M/s TCED, as per the provisions of the Electricity Act, 2003 and Supply Code, 2014, hereby orders the following.
- (1) As per the Regulation 56 of the Supply Code, 2014, the licensee TCED may provide single point supply to the developer M/s Vadakke Madham Brahamaswam as per Regulation 56 of the Supply Code, 2014 as detailed under paragraph-15 above.
  - (2) Supply to the individual beneficiaries of the developer shall be provided at LT voltage levels , strictly complying the Regulation 11 of the Supply Code, 2014, as detailed under paragraph-18 above.
  - (3) The developer shall collect electricity charge from the individual beneficiaries at the 'retail tariff' determined by the Commission from to time, based on the purpose of usage, as detailed under paragraph-21 above.
  - (4) The Single Point Tariff approved for the developer M/s Vadakke Madham Brahamaswam is given below.

Demand charge (Rs/kVA/month)	450
Energy charge (Rs/unit)	7.9

The single point tariff approved is applicable for a period of one year from the date of this order.

- (5) Within one month after completion of one year from the date of this order, the licensee shall, file a separate petition with complete details of the individual beneficiaries for re-determine the single point tariff, for the periods beyond one year from date of this order, as explained under paragraph 24 above.
- (6) Electricity duty shall also be collected by the developer from each beneficiary along with the electricity charges at the rates specified in the Kerala Electricity Duty Act 1963 and the same shall be remitted to M/s TCED latest by 10<sup>th</sup> of the succeeding month.

Petition disposed off. Ordered accordingly.

**Sd/-**

**S.Venugopal  
Member**

**Sd/-**

**Preman Dinaraj  
Chairman**

Approved for issue

C.R Satheesh Chandran  
Administrative Officer  
(In Charge of Secretary)