KERALA STATE ELECTRICITY REGULATORY COMMISSION

THIRUVANANTHAPURAM

PRESENT : Shri. K.J.Mathew, Chairman
Shri P Parameswaran, Member
Shri. Mathew George, Member

April 5, 2012

Petition OP No. 20/2012

In the matter of

Restrictive measures on the electricity usage for the months of April to June 2012

Kerala State Electricity Board - Petitioner

ORDER

1. The Kerala State Electricity Board on 30-3-2012 filed a petition for introducing power restrictions for three months with effect from 1st April, 2012 till 30th June 2012 or till the power position improves. In the petition, the Board has stated that in the ARR&ERC petition for the year 2012-13 itself, the Board had proposed power restrictions at the rate of 15% for the year 2012-13. However, the power situation has worsened since the filing of the ARR due to the following reasons:

   (i) Non availability of open access for the power sourced through traders.
   (ii) Ban imposed by the Karnataka State Government under section-11 of the Electricity Act-2003 on the sale of power outside the State.
   (iii) Intervention by the Hon'ble High Court of Andhra Pradesh on allowing open access
   (iv) Exorbitant rise in the clearing price of the electricity transacted through energy exchanges
   (v) Short-fall in the summer rains and reduction on the energy availability from hydel sources.
   (vi) Excessive increase in the energy and peak demand over the same projected in the ARR.

2. In the petition, the Board has estimated the demand for April and May 2012 as 59MU per day. The hydro availability is estimated as 20.48MU per day for April and May 2012 and CGS availability as 25MU per day. Considering 0.39MU per day from Small IPPs and one MU in April and 1.44MU in May the total deficit is estimated as 12.13MU in April and 11.69MU in May. This works out to 20 to 21% of the daily demand. Accordingly, the Board stated that to meet the deficit, the additional liability would be about Rs.10.37 crore per day considering the rate of liquid fuel stations which is about Rs.11.50 per unit. In order to tide over the critical power situation, the Board has proposed the following measures:

   a) Imposing ½ hour cyclic load shedding on all 11 kV feeders during the period between 6:30 pm to 10:30 pm.

   b) Limiting the electricity usage of all HT and EHT consumers and Bulk Licensees at normal tariff to 80% of the previous one year's average consumption, and charging the excess consumption over the limit @ Rs.11.00 per unit, which is the average marginal cost of sourcing power from liquid fuel stations.

3. By imposing the restrictions, the Board expects a reduction of 1.2MU per day due to load shedding and about 2.8MU per day due to power restrictions on HT-EHT consumers. The total reduction will be about 4MU per day and about 350MW in peak demand.

4. The Commission considered the proposal of the Board and issued an interim order allowing the Board to introduce ½ hour cyclic load shedding per day on all 11 kV feeders between 6:30 pm to 10:30 pm from 2-4-2012. It was decided to hold a public hearing on the petition on 4-4-2012. Accordingly, the Commission issued a press release for the information of all the stakeholders on the Hearing. The Board was also given directions for giving maximum publicity for the hearing. In addition, a public notice on the proposed hearing was put up on the website of the Commission also.

Hearing on the Petition

5. The matter was heard on 4-4-2012 at the office of the Commission. Representing the Board, Chief Engineer Smt. Gayathri Nair made a detailed presentation of their petition justifying the imposition of restrictions and load shedding. Shri. Venugopal, Member Finance addressed the queries of the Commission. According to the Board, in the present situation, Board may be forced to meet the demand through Liquid Fuel Stations (LFS) due to limitations

in importing power and financial constraints. Due to corridor constraints, only limited quantity of power already contracted is available now. The cost of energy from LFS is prohibitively high. Since deficit is about 19 to 20%, Board requested for imposition of restrictions on HT&EHT consumers by invoking section 23, Section 62 of the Electricity Act and para 8.2.1 of National Tariff Policy.

6. During the hearing, representatives of the industrial consumers objected to the proposal of power restrictions. Most of the representatives of the HT-EHT industries objected to the argument of KSEB that the industries have the capacity to pay and can pass on the additional burden to their consumers. The licensees such as M/s Cochin Port Trust, M/s Cochin Special Economic Zone M/s Infopark, and M/s. KDHPCL conveyed their written objections on the petition. However, they have agreed to carryout the restrictions on their consumers. M/s Technopark which participated in the hearing raised the issue of switching off of 11kV feeders by KSEB for load shedding instead of leaving the flexibility to the Technopark.

7. Shri. Dijo Kappan, Centre for Consumer Education objected to the petition of KSEB and stated that it is not proper to load the cost of lack of planning and inefficiency of KSEB on to the consumers. KSEB is not initiating measures for increasing generation capability. Muppatthadam Maveli Residents' Association, Aluva mentioned that power restrictions should be implemented equitably on all sections of the consumers. Shri. K.K. Jayan representing domestic consumers, argued that the high end consumers should not be given the benefit of lower tariff and the additional burden should be compensated by Government.

8. Representing HT-EHT Association, Shri A.A.M Nawas has stated that the proposal of the Board is not justifiable. He drew attention to large variations in the projections of the Board made in the ARR&ERC petition and the present petition, which according to him is created purposefully for imposing power restrictions in April and May 2012. According to the Association, the increase in demand witnessed in March is usual due to the examination season and the proposal based on such projections is not justifiable. If the demand is projected based on CAGR and normal availability from traders/exchange is assumed there is no requirement of liquid fuel stations and deficit will be only in May that too only 5%. The Association worked out the additional liability due to 20% restrictions as Rs.1.63 to Rs.2.19 perunit which would translate to 40 to 50% increase in energy cost. Hence, they requested to reject the proposal. If at all it is imposed it can be only 5% to 10% and in such case the base average can be based on those months in the base period with at least 70% of the maximum

monthly consumption. The Association requested for rejecting the petition of KSEB.

9. Shri. A.R Satheesh, representing M/s.Carborandum Universal has also stated that there is no necessity for restrictions and demand reduction through load shedding is enough to manage the current demand. The Board has stated that the deficit is 12MU and savings of 4MU is expected from load shedding and restrictions. It is not mentioned how the balance 8MU is arranged and the same will again be loaded on to HT & EHT sector in truing up. According to him, the proposal for power restrictions to only HT & EHT categories is discrimination and is against the Electricity Act 2003. KSEB is targeting their valuable consumers leaving out 99.97% of the consumers. Any difference in cost may be adjusted through fuel surcharge than imposing restrictions.

10. Shri. Madhu Mohan of Hindalco stated that already their unit is surviving on a thin margin and power restrictions will lead to doubling of power cost. Shri. Sambasivan also shared the view that Hindalco is not able to absorb the additional burden. Representatives of the Southern India Mills Association, M/s Precot Meridian and M/s GTN Textiles also expressed difficulties faced by the textile sector and requested to reject the petition of KSEB since the proposal would increase the average tariff by 50%. The Joint Council of Trade Unions of GTN mills stated that additional burden due to power restrictions will be about Rs.55 lakhs. Hence they requested to reject the proposal. Employee Association of M/s Patspin also raised similar augments.

11. Shri. K.N.Gopinath representing Standing Council of Trade Unions also mentioned that power restrictions are not necessary, as it will only result in closure of industries working with thin margin. Shri. Venugopal, SETR, stated that there is no scope to accept the power restrictions for the industrial unit. Shri. Shajahan, representing M/s HNL stated that the margin for HNL Is very thin and any increase in power cost will lead to financial difficulties. Shri. Unnikrishan Apolo Tyres stated in the last year, the unit worked only at 50% capacity and while deciding quota the same has to be considered. Shri. Jijo Kuriakose, representing M/s Binani Zinc stated that the additional burden will be Rs.2.27 crore per month for the company and imposing power restrictions sparing majority of consumers is not justifiable. According to him the base average may be estimated as per the 1996 order of the Board. Shri. Pradeepkumar, MRF Limited stated that the additional burden will be about Rs.90 lakh per month. Since the unit only worked partially last year the effective restriction will be 38%.

Shri. V.P Joy representing employee union of Binani Zinc also shared the common view and stated that open access charges should be rationalized. Shri. K.V Muraleedharan stated that the power restrictions will affect the entire industrial area and the deficit of the Board should be addressed through general increase in tariff. Shri. Ragesh Kumar representing employees union of Binani Zinc mentioned that cost of inefficiency and lack planning cannot be loaded on to the consumers. Shri.P.Suresh, and Shri Somadas, HNL stated that additional burden will be about Rs.1.93 crore and the company cannot afford such increase in tariff. Shri. Ramesh representing TCC employees Association stated that the turn over of the company is Rs.135 crore and the electricity bill itself is Rs.65 crore. The additional cost due to power restrictions is at present not affordable to the companies. Shri. Ajith, representing M/s TCC stated that company will not break-even if operations are at 80% level. The employee associations of TCC jointly requested to reject the proposal of KSEB. Shri. Nikhilesh of Apolo Tyres also stated similar objections. Shri Unnikrishna Prasad representing M/s FACT stated that power restrictions will severely affect the operations of the Company. Shri. V.Jayamohan representing CMRL stated that the additional burden will be Rs.75 lakhs per month. Shri. Firoz representing M/s Travancore Titanium Products stated that the additional expenses will be Rs.22 lakhs per month and quota based on previous year consumption will affect the unit.

12. The CEOs Forum in their representation mentioned that the break-even level of industries are above 85% hence operation below the level will be difficult. The present electricity shortage situation is definitely manageable without resorting to power restrictions. With additional availability from central stations, the power situation is manageable.

Analysis and decision of the Commission

13. The Commission has considered the petition of the Board and the arguments of the objectors. The Commission has strong reservations on the proposal of power restrictions in the present context. The Commission had allowed restrictions on two occasions in the past: in 2008-09 and in 2010-11 considering the pressing situations existing then. In both cases, the power situation was grave : 2008-09 was characterized by forced shut down of two major generating stations at Moozhiyar and Panniyar due to tragic accidents coupled with unprecedented increase in crude oil prices, where as in 2010-11 there was considerable reduction in central share due to coal shortages and failure of monsoon in 2009. However 2011 was an exceptionally good year as far as inflow is concerned.

KSEB's own figure of hydro generation upto 31-3-2012 shows a generation of 8121MU. There was relatively higher central allocation also. On last two occasions, KSEB has approached the Commission after extensive deliberations with the stakeholders. This time no such attempt is seen made.

14. The Commission would like to stress that on the previous occasions, the Commission had pointed out that the burden of power restrictions also should be shared by all sections of the consumers. The Board on the previous occasions had proposed restrictions to cover all sections of the consumers. However, in the present petition, the Board has given a proposal specifically targeting only a section of the consumers leaving more than 99% of the consumers from sharing the burden. The Commission is of the view that it is not proper to load the additional financial liability on certain sections of the consumers alone. Such a measure will be against the spirit of the Act and the Tariff Policy. As such there has to be a proposal for extending the restrictions to LT consumers also.

15. The Board's rationale for imposing power restrictions is the increase in demand and heavy dependence on Liquid Fuel Stations (LFS) where as the objectors with supporting data have pointed out that there is no shortage of power. According to the objectors, there is no pressing demand for introduction of restriction. It is pertinent to note that in the petition also Board has not specifically pointed out lack of availability, but focused on the additional financial liability due to purchase of power. It is the case of the Board that to meet the demand, about 11 to 12 MU needs to be procured from LFS. Considering the present financial position, procurement from liquid fuel stations would mean additional financial liability of about Rs.10.34 crore per day. By imposing load shedding and power restrictions, the Board expected to reduce 4MU per day. Hence, it is clear that the intention of power restrictions/load shedding is to limit the power purchase to affordable levels and not an account of genuine shortage of power.

16. The Commission observes that there has been an unabated increase in the demand for power in 2011-12, which is likely to continue this year, unless proper signals are given to the consumers. Because of the increase in the cost of fuel, cost of power from LFS has reached a level of more than Rs.10/kWh. Due to transmission congestion in S1 & S2 region, there has been difficulty in importing power from other regions. This being situation, however, the Commission has serious dissatisfaction towards the power management undertaken by the Board in 2011-12, which led to the present situation as shown below.

Storage and cumulative water availability over the years

Year	Storage as on 31st March (MU)	Cumulative Inflow in Water Year (MU)
2008	1883	9,434
2009	1639	5,189
2010	1672	6,334
2011	1981	6,591
2012	1606	7,152

17. The above table shows the lack of comprehensive generation planning exercise undertaken by the Board. The Board could not properly forecast the demand and exploit the market situations to its best ability, which has led to the present crisis. The year 2011-12 was started with more than average storage position (about 300MU more) and second best water inflow in last 5 years. However the present reservoir position is lowest in 5 years, leading to in a precarious hyro position to start with in 2012-13. The details before the Commission amply indicate the inadequate system management in 2011-12 resulting in the present critical situation. If the present reservoir position was same as that of the previous year, additional generation possible would have been about 6 MU, which would completely alleviate the present critical situation. The Commission in the ARR&ERC Order for 2011-12 directed the Board as follows:

    "The Commission directs the Board to continue the utilization of the emerging energy market in the country more aggressively by strengthening the required teams and systems . The Board should streamline the decision making processes related to short term transactions and empower the teams to take the required decisions in such situations. The Commission directs the Board to effectively utilize emerging energy market in the country to insulate the consumers in the state from the rising cost of liquid fuel based electricity. The Board shall submit a report on the compliance of the above directions within 3 months"

18. The Commission observes that in spite of the mandate and direction given above, the Board failed in procuring sufficient power from the market through advance planning and action. So also the management of the hydel resources especially during September and October 2011 had been marked by lack of consistency and vision. In the power position review of the meeting held at the Office of the Commission in the month of December 2011, the Board has presented a positive picture about the power position in 2011-12, and concluded

that no load shedding or power restrictions would be required. However, suddenly, the position has changed and in the beginning of the financial year itself moved the Commission for introducing the restrictions. The lack of short and medium term planning with possible alternatives and contingency plans resulted in less than optimal outcomes in procurement of power from open market and traders. The Board still could not finalise the Case 1 bidding, which would have been handy if properly concluded as planned. As has been directed by the Commission, the Board also failed to take necessary steps in promoting DSM activities in 2011-12 to curtail the demand. The Commission has been insisting on proposals on ToD tariff for high end LT consumers, which is yet to be acted upon by the Board which contributed to the current situation.

19. Thus, the Commission is of the view that the present situation the result of lack of short term/medium term planning by KSEB. KSEB did not make any serious efforts to foresee such delays and propose any contingency plan on a war footing. KSEB has always resorted to firefighting measures in the event of contingency as has been argued by some of the objectors.

20. As per the estimates available with the Commission, based on KSEB's statistics the power position as on 31-3-2012 is given below:

	Million Units
Storage as on 31-3-2012	1606
Average Inflow expected in April, 2012	105
Average Inflow expected in May,2012	176
Available hydro	1,887
Less contingency reserve for June	550
Balance Hydro available upto 31-5-2012	1,337
Per day hydro generation	**21.93**
Per day Hydro including small IPPs (approx)	22
Average availability from CGS (including additional 50MW)	27
Traders & UI (Average of March, 2012) Approx	4
Total Availability except LFS	**53**
Average daily demand (April-May)	59
Balance Required	**6**
Percentage to be met from LFS	**10.16%**

21. As per the estimates of KSEB, about 11to 12 MU per day ie., about 20% is required from LFS. However, as shown above, the dependence will be only

around 10%. Hence, the Commission is of the view that there is no alarming shortage as projected by KSEB, which warrants power restrictions as proposed by KSEB.

22. Though this is the case, it is a fact that energy price has been increasing in the short term. The Board has presented the difficult situation in procurement of power from open market mainly due to corridor congestions and lack of liquidity. The Board has pointed out during the hearing that out of around Rs.500 crore of revenue collection during the current months, around Rs.470 crore is required for settling power purchase bills. The Commission does not want a situation where the Utility fails to schedule power from CGS or LFS due to liquidity problems. The Commission cannot ignore such realities. Ensuring the financial viability of the Board to serve the needs of the consumers is importance to the Commission. Hence, the Commission is inclined to provide interim relief to the Board in the present circumstances.

23. The consumption pattern in the State is rapidly changing, possibly owing to the addition of various modern gadgets. The ratio of peak demand to off-peak demand is falling considerably. As per the presentation of the Board, there is an overall upward shift in the system load curve. The Commission also considers the fact that energy demand in neighbouring States has been increasing due to the oncoming summer season. Energy prices are expected to increase further increase in demand. There may also be possibility of forced shutdown/breakdown of stations due to severe production conditions during summer. It is also pertinent to note that if unabated purchase of high cost energy at Rs.10 and above per unit is resorted to, the resultant cost in any case will have to be borne by all the consumers as part of ARR&ERC or Truing up exercise in future.

24. Considering all these factors in mind, **the Commission is inclined to accept the proposal of power restrictions on HT&EHT consumers by imposing a minimal restriction of 10% for the months of April and May**. Hence, all HT & EHT consumers are eligible to consume energy upto 90% of the average consumption at normal tariff and any excess consumption will be charged at the rate of high-cost energy as determined by the Commission. The Commission based on the petition of the Board and its own analysis decides **that the rate of high cost energy will be Rs.10 per unit for billing consumption over the quota. Fuel Surcharge will not be made applicable for excess consumption charged at the high rate**.

25. The Commission is also of the view that the 10% restrictions may not severely affect the consumers. Consumption can be reduced by about 10% easily through energy efficiency measures and reducing wasteful/luxury consumption. Consumption of most of the industrial consumers in April and May would be lower due to annual maintenance of plants. Other HT consumers can limit the consumption by 10% so that the objective is achieved. The Commission expects that such a measure will give proper signals for the consumers to reduce consumption.

26. The Commission also considered the suggestions of the consumers on deciding the quota. Some consumers argued that the methodology of fixing quota shall be same as that of 1996. The Commission has considered the submissions of the consumers. At present, the Board is following a time tested method of estimating the average by leaving out all months of nil consumption, and arriving at the average by leaving out the months with consumption above or below 30% of the average. 90% of this average will be the quota for the consumer. The Commission is of the view that the same method can continue this year also.

27. The Commission has also given thought to the imposition/continuation of load shedding. The Commission considering the urgent nature of the events, in an interim order imposed ½ hour cyclic load shedding in 11kV feeders pending hearing on the matter. At present, all LT consumers face forceful restrictions in the use of power through load shedding. It is also fair that the LT consumes also share the difficulties of the present situation. **Considering the increase in the peak demand and necessity to reduce the demand, the Commission decides to continue the load shedding till 31st May 2012.** Licensees other than KSEB will also implement the load shedding as specified.

28. Some consumers have represented that some HT consumers connected to common 11kV feeders would face both power restrictions and load shedding. It is not the intention of the Commission to have both power restrictions and load shedding for the same consumer. In a few situations where some HT consumers are connected to common feeders, it may not be possible to exempt them from load shedding. In this regard, the Commission would order that all licensees as far as possible should exempt HT consumers from load shedding subject to operational constraints.

29. M/s Technopark has stated that as per the orders of the Commission, the licensees have to operate the load shedding, but KSEB switch off the feeders from the substation itself, thereby denying power to all dedicated HT consumers. In this regard, the Commission is of the view that, it is the primary duty of

incumbent licensees to ensure that load shedding is implemented as ordered by the Commission. If the licensees can ensure the internal mechanism to implement load shedding, the same can be allowed. The Board in consultation with such licensees will sort out the matter amicably, keeping in mind the spirit of imposition of restrictions.

Orders of the Commission

30. Considering the submissions and arguments made by the parties, the power position of the State and the need to promote the conservation of power, the Commission decides to accept the proposal of KSEB with modifications. Accordingly it is ordered as follows:

a) The ½ hour cyclic load shedding in 11kV feeders with effect from 2-4-2012 as per the interim order dated 30-3-2012 will continue till 31-5-2012.

b) Power restriction is introduced from **5-4-2012** for all HT&EHT consumers of all licensees in the State at the rate of 10% of the consumption. The HT&EHT consumers of the State shall limit their energy consumption to 90% of their base average consumption in 2011-12, which will be charged at normal tariff. This will be applicable to the HT&EHT consumers of KSEB as well as other licensees in the State. The excess consumption over the 90% limit shall be charged at a higher rate of Rs. 10/- (Rupees Ten Only) per unit. The Power restrictions shall be effective **till 31-5-2012.**

c) The quota for power restrictions shall be 90% of base average consumption. For estimating the base average consumption, base year may be taken as 2011-12 ie., months of April 2011 to March 2012. Base average consumption for HT/EHT consumers shall be arrived at by estimating the average excluding the months of 'nil' consumption, and then arriving at the base average by leaving out the months of consumption above or below 30% of that average. 90% of this average will be the quota for the consumer.

d) In the case of new consumers who has availed power connection from January 2012 onwards, the base average consumption shall be fixed as 250kWh/kVA of contract demand for HT consumers and 400kWh/kVA of contract Demand for EHT consumers. The quota shall be worked out accordingly.

e) The Board may constitute a Grievance Redressal Committee at the Head Quarters consisting of senior officers for addressing all genuine complaints regarding fixation of quota from HT&EHT consumers.

f) Fuel Surcharge is not applicable to excess consumption at the high rate.

g) There shall be no restriction on maximum demand

h) The Licensees other than KSEB shall follow the same principles as above in fixing the quota for power restrictions. Additional revenue from consumers for excess consumption billed at higher rates shall be transferred to KSEB promptly on a monthly basis.

i) All licensees including KSEB shall indicate the quota, excess consumption and rate charged for excess consumption etc., separately in the bills issued to the consumers. Licensees shall take steps to resolve the disputes or doubts of the consumers on this issue in a time bound manner, without causing hardship to the consumers.

j) Copy of this order shall be issued to all licensees for compliance.

k) As has been agreed by the Board, power restrictions are not applicable to Railway Traction.

l) The Board may immediately approach the Commission with suitable proposals for extending the restrictions to LT consumers.

m) **The Commission shall review the power situation and adequacy/continuation of restrictions/load shedding in the second week of May 2012.** KSEB shall submit all supporting data for the review by 14-5-2012

31. The petition is disposed of accordingly.

Sd/-	Sd/-	Sd/-
P.Parameswaran	**Mathew George**	**K.J.Mathew**
Member	**Member**	**Chairman**

Approved for Issue

Secretary

LIST OF PERSONS ATTENDED PUBLIC HEARING

ON POWER RESTRICTION HELD ON 4TH APRIL 2012

AT COMMISSION'S OFFICE AT 11:00 AM

1. Shri. Venugopal, Member, KSEB
2. Smt. Gayathri Nair, CE, C&T
3. Shri. Sivaprasad, E.E., TRAC
4. Smt. Sreedevi.B, Dy. CE, TRAC
5. Smt. Gisy Elzy John, AE, TRAC
6. Shri. Edward.P, AE, TRAC
7. Smt. Ambili.S. Poonkavan, AEE, TRAC
8. Smt. Latha.S.V, AEE TRAC
9. Shri. A.M. Navaz, HT & EHT Association
10. Shri. S. Madhumohanan, Hindalco
11. Shri. B.V. Chandrasheker, Chief Engineer, Southern Railway
12. Shri. A.R.Satheesh, Carborandum Universal
13. Shri. Sambasivan.V.K, Hindalco
14. Shri. Ali.P.K, Hindalco
15. Shri. K. Mohanan, Hindalco
16. Shri. Venugopal, Palakkad
17. Shri. John Mathew, HNL
18. Shri. Shajahan, HNL
19. Shri. Unnikrishnan, Appollo
20. Shri. Jijo Kuriakose, Binani Zinc
21. Shri. Pradeep Kumar, MRF
22. Shri. Sadasivan Achari, KMML
23. Shri. K.N. Gopinath, Hindalco
24. Shri. P.P.Joy, Binani
25. Shri. P.Raju, Ex MLA
26. Shri. A.N. Yoosaf, Ex MLA
27. Shri. V.P.George
28. Shri. N.K.Mohan Das, BMS
29. Shri. P.S. Gangadharan, CITU
30. Shri. K.K. Jayan, Domestic Consumer
31. Shri. K.V.Muralidharan, Domestic Consumer
32. Shri. Ragesh Kumar, Domestic Consumer
33. Shri. Arul Chandran
34. Shri. M.C.Saly
35. Shri. M.T.Ramachandran
36. Shri. Dijo Kappan, Palai
37. Shri. Krishnakumar, GTN Textile, Aluva
38. Shri. K.J. Dominic, AITUC, GTN

39. Shri. K. Kohammedali, CITU, GTN
40. Shri. Saju. P.M, INTUC, GTN
41. Shri. E.G. Jayaprakash, BMS, GTN
42. Shri. P.Suresh, CITU, HNL
43. Shri. C.K. Mathew, INTUC, HNL
44. Shri. Somadas, HNL Employees Association
45. Shri. Ragurajan, SIMA, Coimbatore
46. Shri. Ramesan, VK Tec Employees Association
47. Shri. M.P.M. Son, TCC Thozhilali Union & STU Leader
48. Shri. Ajith.R, TCC Ltd, Udygamandal
49. Shri. Ramesh.S, TCC Ltd Udyogamandal
50. Shri. Anoop Raj, TCC Ltd, Udyogamandal
51. Shri. Isac Mathew, TCC Officers Association
52. Shri. A.P.Antony, TCC Employees Union (INTUC)
53. Shri. Joy Paul, TCC Workers Association
54. Shri. M.K.Rajan, TCC Thozhilali Union
55. Shri. Ajikumar, TCC Emplyees Association
56. Shri. Bose
57. Shri. Ramadas, Trade Union
58. Shri. A. Ahammed Koya, GM(P), The Western India, Kannur
59. Shri. John.K.V, DGM, Precot Meridian Ltd, Kanjikode
60. Shri. B.K. Shajahan, HNL News print
61. Shri. John Mathews, HNL Newsprint
62. Shri. K.Suresh, Textile, Patspin, Palakkad
63. Shri. Anandhan, Textile, Patspin, Palakkad
64. Shri. Kesavankutty, Textile, Patspin, Palakkad
65. Shri. G.AchuthanNair, Patspin India Ltd
66. Shri. P.A.Suresh, Patspin India Ltd, BMS
67. Shri. Babu, Patspin India Ltd, INTUC
68. Shri. C.Ramesh, Patspin India Ltd, CITU
69. Shri. Ramachandran Achari, AGM , KMM
70. Shri. Balu, DGM, KMM
71. Shri. Ali.K.K
72. Shri. Sambasivan
73. Shri. Mohanan
74. Shri. Johny George, MRF Ltd, Kottayam
75. Shri. Y.S. Jayakumar, Deepika
76. Shri. Raghavan.P.P, HNL Newsprint, Kottayam
77. Shri. Chandy Abraham, CMRL, Aluva
78. Shri. S.Vijayakumar, Southern Railway
79. Shri. R.S. Shenai, Southern Railway
80. Shri. R.Jayaraman, KDHP, Munnar
81. Shri.T.K.Unnikrishna Prasad, FACT
82. Shri. Dhanashyam Nair

83. Dr. V.Jayamohan, CMRL
84. Shri. V.K.Unnikrishnan, Appollo Tyres Ltd
85. Shri. Nikhilesh.R, Appollo Tyres Ltd
86. Shri. Einstein.E.V. Electrical Engg, Technopark
87. Shri. Peter.C.A, KSSIA
88. Shri. Sajith.G.R, Infosis, TVM
89. Shri. Firoz.N, Travancore Titanium Products