# KERALA STATE ELECTRICITY REGULATORY COMMISSION
# THIRUVANANTHAPURAM

**DECEMBER 2, 2009**

PRESENT: Shri. K.J.Mathew, Chairman
Shri. C. Abdulla, Member
Shri. M.P.Aiyappan, Member

**Petition TP No.66 of 2009**

IN THE MATTER OF

Proposals for rationalisation of existing tariff

Kerala State Electricity Board ---- Petitioner

## ORDER

**Background**

1. KSEB filed a petition on 24-07-2009 for rationalizing the existing tariff structure which would result in additional revenue of Rs.150.86 crore on a yearly basis. Major highlights of the proposal are (a) introduction of non-telescopic tariff for domestic, (b) 15% & 20% increase in demand and energy charges respectively for HT Commercial class, (c) 25% increase in tariff for Bulk supply (BST) to Licensees and (d) reduction to the tune of 10% of the tariff applicable to KWA. Further, KSEB proposed to rationalize the ToD tariff applicable to HT/EHT consumers and proposed to introduce ToD tariff for LT industrial consumers. The Commission sought clarifications from KSEB on the petition vide letter dated 25-07-2009. KSEB furnished clarifications vide letter dated 5-08-2009. The Commission in its proceedings dated 5-08-2009 admitted the petition and directed the Board to publish a summary of the proposals for inviting objections from the stakeholders and general public as required under Clause 5 of KSERC (Tariff) Regulations, 2003. KSEB published the summary of the proposals giving time till 23-9-2009 for furnishing objections/comments by the

consumers and the public. The date and venue of the public hearing were also mentioned in the notification. In response to the notification a total of 85 written objections were received at the Commission's Office. The Commission forwarded the objections to KSEB for reply. KSEB communicated its reply vide letter dated 21-10-2009.

**Deliberations in the State Advisory Committee**

2. The Tariff proposal of KSEB was placed in the 20th State Advisory Committee meeting held on 10-9-2009. The members of the Committee expressed diverse views on the proposal. Many members objected to reduction in tariff for KWA, and increase in HT-IV tariff. Regarding the proposal on domestic category, some members welcomed the proposal on rationalisation, but others opined that the proposal was unscientific.

**Public hearing**

3. The Commission conducted public hearings at three places: Institution of Engineers Hall, Thiruvananthapuram on 09-09-2009; Municipal Town Hall, Kalamassery on 16-09-2009 and at Town Hall, Kozhikode on 22-09-2009. Many stakeholders presented their views in the public hearing. The list of persons who attended the public hearings and those who have given written comments are given in Annexure-I.

4. KSEB in its petition has proposed many changes in the existing tariff for rationalization & recategorisation. For the convenience of disposal of the petition, the Commission segregates the proposal as shown below:

   Section 1: Tariff revision proposal
   Section 2: Rationalization of Time of Day tariff
   Section 3 : Tariff Re-categorization

   In the first section, the tariff revision proposal for domestic, HT commercial, reduction in tariff applicable to KWA and revision of Bulk Supply Tariff applicable to licensees are included. The second section, deals with rationalisation of ToD tariff for HT/EHT/LT industrial consumers and in the third section, issues regarding recategorisation are addressed.

## SECTION 1: TARIFF REVISION PROPOSALS

5. *Domestic Tariff:* KSEB stated that in the present domestic tariff, the benefit of lower slab is enjoyed by all consumers. Considering the situation prevailing in Kerala, the benefit of lower tariffs needs to be continued for the lower consumption groups, where as it need not be extended to high consuming groups. According to KSEB, monthly consumption of a middle class family is about 150 to 200 units only. Of the 75 lakhs domestic consumers only 2.44 lakh consumers have consumption of more than 200 units per month. Accordingly, KSEB proposed that the present telescopic system of billing shall be replaced with a non-telescopic system for domestic consumers having consumption more than 200 units per month. In order to avoid tariff shock, the Board proposed 15% reduction in rates for the existing slabs above 200 units or the non-telescopic category. Thus the cross subsidy for lower slabs can be met from higher slabs. The proposal is as follows.

| Slab (units) | **Existing Tariff** | | | **Proposal** | | | |
|---|---|---|---|---|---|---|---|
| | Existing Tariff | Revenue at Existing tariff | Remarks | Tariff rate | Revenue at proposed tariff | Addl income | Remarks |
| | (Rs/kWh) | (Rs. Cr) | | (Rs/kWh) | (Rs.Cr) | (Rs.Cr) | |
| 0-40 | 1.15 | 102.66 | Telescopic tariff system | 1.15 | 102.66 | 0.00 | No increase |
| 41-80 | 1.90 | 250.94 | | 1.90 | 250.94 | 0.00 | |
| 81-120 | 2.40 | 236.95 | | 2.40 | 236.95 | 0.00 | |
| 121-150 | 3.00 | 173.49 | | 3.00 | 173.49 | 0.00 | |
| **151-200** | **3.65** | **186.77** | | 3.65 | 186.77 | 0.00 | |
| 201-300 | 4.30 | 154.36 | | 3.65 | 200.33 | 45.97 | Non- telescopic with reduction in slab rate |
| 301-500 | 5.30 | 90.42 | | 4.50 | 110.10 | 19.68 | |
| Above 500 | 5.45 | 65.61 | | 5.00 | 69.43 | 3.82 | |
| **Total** | | **1261.21** | | | **1330.68** | **69.47** | |

According to KSEB, the proposed increase for consumers having consumption of more than 200 units/month which constitute only 3.2% of the consumers, but the resultant tariff increase would be in the range of 13.6% to 32.90% per month.

***Response of stakeholders***

6. The Kerala HT and EHT Consumers Association pointed out that for LT Domestic Consumers, the average cost of supply for 2007-08 is 393 Ps/Unit where as the tariff for monthly consumption up to 40 units is Ps 115/Unit only ie just 29.26% of the average cost. According to them, the clause 5.5 of the National Electricity Policy, provides for recovery of cost. Even for the designated BPL group of consumers tariff shall be at least 50% of the average cost of supply. Solidarity Youth Movement, Ernakulam District Committee and Islamic Centre, Pulleppady, Kochi pointed out that the proposal of KSEB affects most of the consumers who consume between 400 and 600 units bi-monthly, hence the proposal is directed against the middle class in the society. Sri Paul George, Peroorkada, and Kairali Nagar Residents Association, Maradu, Cochin also expressed similar opinion. M/s.Binani Zinc Ltd pointed out that tariff should be rationalized reflecting the categorywise cost of supply, which should move in a manner to reduce cross subsidy. Sri C. Jayapalan, Peroorkada pointed out that demand side management has not been reflected fully in the electricity tariff structure of Kerala even after one decade, especially for domestic consumers and other LT consumers. According to Edappaly Senior Citizens Forum, the Board has proposed a barbarian method of increasing tariff for exploiting consumers, without taking action on reducing losses. The Kerala State A Grade Electrical Contractors Association opined that in order to meet at least part of Cost of Supply (COS), tariff level of domestic consumers have to be increased. M/s Rubber Park India Private Ltd pointed out that the non-telescopic system may not encourage energy efficiency as the saving may not be large to get reflected in the bill. Instead, telescopic tariff structure, maintained with lesser bandwidth for additional/increased tariff/penalty would alone automatically work more efficiently.

7. In reply KSEB maintained that Act or Tariff Policy does not mandate tariff based on category wise cost of supply. As per the section-61(g) and Section 62 (3) of the Act the tariff can be differentiated according to the purpose for which the supply is being required. The ceiling of 200 units/ month was proposed considering the normal monthly consumption of an average middle

income domestic family. The non-telescopic proposal aimed at discouraging luxury and wasteful consumption of electricity. Further, the Commission is yet to notify the regulation on reduction of cross subsidy.

8. *HT Commercial Category :* KSEB proposed 15% increase in demand charges and 20% increase in energy charges of HT IV commercial category. According to KSEB, majority of consumers under this category are Jewellers, Big Textile Showrooms, Wedding Centers , Shopping Complexes, who form only a small portion of total consumers. Considering the affluence of this category, the tariff revision is proposed. Further, KSEB contended that the disparity between HT commercial and LT commercial has to be bridged as the average tariff for LT Commercial consumer is Rs.8.12/Unit and HT Commercial Consumer Rs.4.81/unit. Increase in tariff proposed by KSEB is as follows:

| Billing demand | Energy consumption | Existing Tariff | | Proposed Tariff | | Revenue from Tariff | | Addl . Income |
|---|---|---|---|---|---|---|---|---|
| | | Demand Charge | Energy Charge | Demand Charge | Energy Charge | Existing tariff | Proposed tariff | |
| (MVA) | (MU) | (Rs/kVA) | (Rs /kWh) | (Rs/kVA) | (Rs/kWh) | (Rs. Cr) | (Rs. Cr) | (Rs. Cr) |
| 182.00 | 686.00 | 350.00 | 3.70 | 400.00 | 4.40 | 330.26 | 389.2 | 58.94 |

***Response of stakeholders***

9. Kerala Hotel and Restaurant Association, Kochi unit and Calicut unit pointed out that Hotel and Restaurants cannot control use of electricity hence higher tariff rate will be a heavy burden. M/s Bhatsons Aquatic Products Cochin, Geo Seafoods Cochin, Abad Exports Pvt Ltd Cochin and Accelerated Freeze Drying Company Ltd, Ezhupunna pointed out that Seafood Processing Units shall be brought under HT-I Industrial Tariff and in the event of no consideration of such tariff change to HT-I Industrial, the present tariff HT IV Commercial should not be increased further considering the difficulties faced by seafood industry. The HT and EHT Industrial Consumers Association maintained that the reason given by KSEB in proposing a tariff hike for this category of consumers is not justified and cannot be admitted, since affluence of the consumer cannot be the basis for revising their tariff.

10. KSEB in its reply pointed out that tariff can be differentiated as per Section 62(3) of the Act. HT-IV commercial consumers use electricity for maintaining comforts and luxury for attracting and promoting their business. Considering the severe power shortages prevailing in the Country, increase in the tariff for HT-IV commercial category is proposed.

11. *Reduction in Tariff applicable to Kerala Water Authority :* KSEB stated that Kerala Water Authority is billed at respective industrial tariff in LT and HT. KWA has requested KSEB for a holistic approach in fixing tariff for pumping and sewage services since sewage services are provided free of cost and water is highly subsidized. With a support of Government Order, KSEB stated that domestic water supply schemes are presently charged at domestic tariff, but application of domestic tariff to KWA is not feasible as it increases the tariff by about 43%. Hence considering the social importance of providing drinking water at subsidized tariff, KSEB proposes 10% reduction in tariff for both LT & HT tariff applicable to KWA as shown below:

(a) LT supply of KWA for water supply and sewage pumping

| Existing Tariff | | Proposed Tariff | | Revenue from Tariff | | | |
|---|---|---|---|---|---|---|---|
| Fixed Charge (Rs/kW/ month) | Energy Charge (Rs/kWh) | Fixed Charge (Rs/kW/ month) | Energy Charge (Rs/kWh) | Existing Tariff (Rs Cr.) | Proposed Tariff ( Rs Cr.) | Reduction (Rs.Cr) | % of Reduction |
| 45.00 | 3.25 | 30.00 | 3.00 | 39.99 | 36.21 | 3.78 | 9.45 |

(b) HT supply of KWA for water supply and sewage pumping

| Existing Tariff | | Proposed Tariff | | Revenue from Tariff | | | |
|---|---|---|---|---|---|---|---|
| Demand Charge (Rs/kVA/ month) | Energy Charge (Rs/kWh) | Demand Charge (Rs/kVA/ month) | Energy Charge (Rs/kWh) | Existing Tariff (Rs cr) | Proposed Tariff ( Rs Cr) | Reduction (Rs.Cr) | % of Reduction |
| 270 | 3.00 | 250 | 2.75 | 66.39 | 60.10 | 6.29 | 9.47 |

***Response of stakeholders***

12. According to the HT-EHT Association and M/s Binani Zinc Limited, reduction in tariff for KWA should be proposed by Government under Section 65, not by KSEB. Government of Kerala has been forcing KSEB to write off huge arrears of KWA. If GoK wants to subsidise KWA, GoK should pay subsidy in advance to KSEB. In the absence of any commitment to pay such subsidy, a tariff reduction cannot be allowed. In reply KSEB stated that as a Government entity, it has to follow the policy directives of the Government.

13. *Bulk Consumers:* KSEB proposed an increase in tariff of 25% for Bulk Supply Tariff (BST) applicable to Licensees. KSEB argued the licensees are not affected by the risks faced by KSEB in procuring electricity. Further the cost of generation and power purchase has been increasing over the years and the BST is not enhanced correspondingly. The licensees like Thrissur Corporation and Tata Tea limited are making huge profits through electricity retail business by availing energy at highly subsidized rates. Further, the licensees would also be benefitted from the proposed changes in tariff for HT commercial and domestic category. Based on this premise, KSEB proposed increase in BST rates as follows:

| Category (Bulk consumers) | Billing demand | Energy Sales | Existing Tariff | | Proposed Tariff | | Revenue from Tariff | | Addl Income |
|---|---|---|---|---|---|---|---|---|---|
| | | | Demand Charge | Energy Charge | Demand Charge | Energy Charge | Existing Tariff | Proposed Tariff | |
| | (MVA) | (MU) | (Rs/kVA) | (rs/kWh) | (Rs/kVA) | (rs/kWh) | (Rs. Cr) | (Rs. Cr) | (Rs.Cr) |
| 11 kV | 27.51 | 129.00 | 270.00 | 2.85 | 340.00 | 3.55 | 45.68 | 57.02 | 11.34 |
| 66 kV | 18.00 | 75.00 | 260.00 | 2.75 | 325.00 | 3.45 | 26.24 | 32.90 | 6.65 |
| 110 kV | 33.60 | 170.00 | 245.00 | 2.75 | 310.00 | 3.45 | 56.63 | 71.15 | 14.52 |
| Total | 79.11 | 374.00 | | | | | 128.55 | 161.06 | 32.52 |

***Response of stakeholders***

14. The proposal of KSEB for enhancing the BST was severely objected by all the licensees. M/s.Rubber Park India (P) Ltd. Pointed out that, out of the 10 Bulk Consumers, 7 are licensees and of the 7, four licensees have only industrial

consumers. They shall be given a different status as industrial licensees as they are entitled to a better treatment from KSEB. They also objected the claim of KSEB that electricity is supplied at subsidized rates since the tariff for all categories is fixed by the Commission.

15. Cochin Port Trust objected to the revision proposal and stated that it should be rejected. Alternatively, Cochin Port Trust suggested that the additional revenue accrued on account of proposed retail tariff hike applicable to HT Commercial consumers can be passed on to the KSEB after retaining a collection charge @ 10% of additional revenue. They also demanded that the KSEB should enter into a Power Purchase Agreement with a minimum validity period of 10 years.

16. Kanan Devan Hills Plantations Company Private Ltd, Munnar informed that earlier Tariff Revision effective from 1-12-2007 is not applicable to KDHPCL in view of the Judgment of the Hon High Court of Kerala dated 12-03-08 quashing the said revision in tariff so far as applicable to KDHPCL. According to them, the prevailing Grid Tariff is not found in the proposal. Tariff is determined by the Commission on the basis of information submitted by KSEB in the form of ARR and ERC. An element of subsidy is not seen to have been considered by the Commission in arriving at the tariff. Hence the argument of KSEB that they are supplying licensees at highly subsidized rates is not true. The retail tariff of Licensees are fixed by the Commission based on the capital investment made for power distribution infrastructure, recurring expenses incurred by the Licensee, power purchase cost, finance charges, distribution loss etc. Hence the argument of KSEB that licensees are supplying consumers at higher tariff is not factual. Hence, the observation made by KSEB that the licensees are generating huge profits is not correct. Thus the grounds to increase the tariff for supply to licensee are found to be unjustified. Hence they requested the Commission not to accept proposal of KSEB to increase the tariff by 25%.

17. M/s Kinfra stated that the tariff petitionbased on false information and wrong assumptions shall be rejected. The claims of KSEB that licensees are supplying power in their areas at tariffs higher than that of KSEB is wrong as the same

tariff as that of KSEB is charged for the consumers of Kinfra. Further, the prediction that there will be increase in revenue of a licensee due to increase in tariff of commercial consumers is also wrong. They stated that if the proposal of enhancement of tariff for licensees is approved KEPIP would incur revenue loss substantially. KSEB's proposal to simply increase tariff by 25% without considering cost is violation of Section 61 (g) of Electricity Act, 2003.

18. Cochin Special Economic Zone pointed out that there is no justification in the proposal to charge a higher rate from the licensees than the rate at which KSEB supplies to the end users. KSEB is relieved of the burden of distribution expenses including maintenance of distribution lines in the licensee's area. KSEB should indicate break up of cost as generation, transmission and distribution expenses. The basis of costing per unit of energy shall be the cost of generation, transmission and distribution plus a profit margin. This will invariably be lower than the rate at which KSEB supplies power to the end users. If this proposal is approved the licensees will have to charge a higher rate from their LT and HT Industrial consumers. The proposal can only be viewed as a ploy to eliminate all other licensees from the scene , as consumers under them will have to pay a higher rate than the consumers under KSEB. The humble beginning to bring in efficient services and better quality in power distribution will thus face its forced end.

19. M/s Technopark pointed out that tariff for supply of energy by licensee is not fixed by them but stipulated by KSERC. For this the Commission takes into account various aspects such as capital investment made for the power distribution infrastructure, recurring expenditure incurred by the licensee , power purchase cost, finance charges, distribution losses etc. Thus The Commission fixes a fair tariff in a prudent manner and hence licensees cannot supply power to their consumers at higher rates than that of KSEB as stated by KSEB. KSEB is not supplying power to licensees at a subsidized rate. Hence the statement that licensees are generating huge profit is not correct. Thus the grounds to increase the tariff for supply to licensees are found to be unjustified.

20. Thrissur Corporation stated that it would be difficult for them to implement a tariff structure different from KSEB and it will create two types of consumers within the Corporation Limit. According to Corporation, if the proposed tariff is implemented, the net loss in a year would be Rs 6.33 crore. Hence, they requested to treat Thrissur Corporation as a special licensee by allowing a low rate compared to other licensees.

21. In reply to the objections of the M/s.KDHPCL, KSEB stated that M/s KDHPCL has not entered into any agreement with KSEB for getting power supply and requested the Commission to instruct KDHPCL to enter into PPA with KSEB. KSEB also stated that it is not a continuation or extension of tariff revision effective from 1-12-2007. They also felt that it was discriminatory and not justifiable to have lower tariff for consumers of Tata Tea/KDHPC than that prevailing in KSEB area, since ultimately all consumers of the State are getting KSEB power. The cost of power purchase has now reached 60% of the ARR of KSEB. At present more than 50% of the energy requirement of the State is being met by purchasing power from thermal sources at high rates even up to Rs 10 to 12 per unit. The energy rate at the power market also is highly fluctuating and at times energy is not even available at high rates. But the licensees are supplied at lower tariff. KSEB also argued that as per the provisions in the Electricity Act, there is no provision to classify the licenses differently based on their self consumption or segment to which they are supplying power. KSEB also pointed out that major portion of their sales are to the subsidised categories in comparison with other licensees. If the licensee feels that the tariff of KSEB is not competitive, they can opt for obtaining power through other sources and even go in for competitive bidding route for getting power at competitive rates from other sources. According to KSEB, M/s KDHPC can approach the Commission for increase in tariff of its consumers, once Commission approves the KSEB's proposal.

**Analysis of the Commission and Decision**

22. The Commission considered the proposal of KSEB and the objections/ suggestions of the consumers and stakeholders in detail regarding tariff revision. During the public hearings as well as in the written submissions made by the consumers, tariff rationalization proposals of KSEB have been severely

objected to in general. Before going into the merits of the proposal, the necessity of a tariff revision proposal at present needs to be closely examined. It is to be noted that KSEB proposed the rationalisation/revision proposals aimed at generating Rs.150.86 Crore for one year. The Commission in its Order on ARR & ERC had provisionally admitted a revenue gap of Rs.335.30 Crore for 2009-10. Based on the truing up of accounts for 2005-06, the net gap for 2009-10 was reduced to Rs.153.94 Crore. However, the exact revenue gap position could not be ascertained in the absence of truing up for the years after 2005-06 for which audited accounts were not available then. The Commission vide letters dated 28-8-2009 & 10-11-2009, directed KSEB to submit the truing up proposal for the years 2006-07, 2007-08 and 2008-09. This has not been complied with yet. In the absence of truing up, the Commission vide letter dated 31-10-2009, called for the audited accounts/ provisional accounts for the last 3 years for perusal. Preliminary scrutiny of the accounting statements submitted by KSEB reveals that sufficient surplus will be available to meet the estimated net revenue gap for the year 2009-10, thereby exposing the redundancy of a tariff revision at this juncture. The Commission is of the view that because of the various measures adopted by the Board in improving productivity and efficiency in operations during the last three years sufficient surplus will be available to meet the estimated net revenue gap for the year 2009-10 once the truing up exercise is carried out for the years 2006/07, 2007/08 and 2008/09. Increasing efficiency through better management practices is noticeable during this period.

23. The Commission noticed that during this period capital expenditure remained much less than the approved level. Opening cash & bank balance for the year 2009-10 was about Rs. 1178.80 Crore, one reason for such accumulation was lack of capital expenditure coupled with substantial payables to the Government. However KSEB is found to be concentrating on achieving targets under capital expenditure during 2009-10. The status of arrears as on 30-06-2009 shows Rs. 1672 Crore including arrears from KWA. It is observed that the arrears to be collected from State Govt. departments itself is Rs. 157.08 Crore and from State Undertakings excluding KWA is Rs. 220.39 Crore. These arrears have to be collected immediately to reduce borrowing for meeting working

capital requirements. KSEB should take up this matter with Government and the Government should help the Board by timely payment of its electricity dues which will ultimately benefit the ordinary consumer. Considering these factors, the Commission decided that, the proposal for additional revenue through tariff revision is not required at present and expressed the view that the present Board appears to be capable of improving its finances with better management avoiding the necessity of a tariff revision in the near future. However, the Commission is positive to any tariff revision proposal in line with the provisions of the law, if the Board can substantiate the need for it.

24. Viewing from the context of rationalisation also the proposal fails to justify the objective. As observed by the many consumers in the public hearing, the proposal is more towards increasing the distortions in the present structure, by directly flouting the provisions of the Act and Tariff Policy. Proposal on rationalisation of domestic tariff with non-telescopic billing would give tariff shock to a section of consumers. Such proposals indicate that the Board has made no attempt towards rationalisation following the principles envisaged in the Act. The Commission would urge that the Board should consider proposals that would fall in line with the objectives envisaged in the Act/policy on a gradual basis, without tariff shock to any section of consumers.

25. The proposal was examined based on the aspects discussed above. For rationalization of domestic tariff, KSEB has proposed non-telescopic tariff for consumers having consumption more than 200 units per month, mainly to reduce the luxurious consumption. As per KSEB estimates, 200 units per month is a reasonable level for people upto the middle income level. By shifting to non-telescopic system, KSEB expects about Rs.69.47 Crore per annum. KSEB itself pointed out that non-telescopic billing for consumers having consumption above 200 Units/month results in an increase of about 18% to 33% in the bills. The Commission notes that an increase of one unit, from 200 units to 201, would lead to an increase in bill by Rs.239 which is more than 48%. In certain higher slabs the increase in bill amounts is negligible compared with the lower slabs. Such erratic increase in bill amount with minor changes in sales is highly unscientific. Clause 5.5.3 of National Electricity Policy

clearly states that tariff rationalisation to correct the imbalances shall be undertaken without giving tariff shock to the consumers. The Hon. Appellate Tribunal for Electricity in its order dated 26-05-2006 in M/s. Siel Ltd and others Vs Punjab State Electricity Regulatory Commission, has also opined that the cross subsidies have to be brought down by degrees without giving a tariff shock to the consumers. In addition, the present proposal may create pervasive incentives in the field for malpractices and adjustment of bills. The consumers have also strongly argued against the proposal which would disproportionately increase the burden. Hence, the Commission is of the view that the proposal in the present form is not acceptable.

26. As per Section 64(3)(a) of the Electricity Act 2003, the Commission can modify the proposal submitted by the Board. However, the notice under section 64(2) is aimed at only part of the domestic consumers, the Commission is constrained to abstain from making any modifications in the proposal under section 64(3)(a). In the light of above, the Commission is not in a position to accept the proposal of KSEB in this regard.

27. In the case of HT IV Commercial category, KSEB proposed 15% increase in demand charges and 20% increase in energy charges. This would result in an increase in average realization by 86 paise/unit ie., from Rs.4.81/unit to Rs.5.67/unit, which is about 18% average increase in tariff. KSEB expects about Rs.58.94 Crore as additional revenue for one year. According to KSEB, majority of consumers under this category consists of Jewellers, Big Textile Showrooms, Wedding Centers, Shopping Complexes etc., and considering the affluence of this category, the tariff revision is proposed.

28. The Consumers have pointed out that the increase in the tariff for HT IV is not proper. The Commission is of the view that, the proposed 18% increase in tariff for HT IV category alone, is not in line with the provisions of the Act. As per section 61(g), the tariff should progressively reflect cost of supply of electricity and reduce cross subsidies. In the present case, the cross subsidy level as per the pre-revised rates is about 25%, which would increase to about 48% based on average cost of supply for the year 2009-10. Such increase in

cross subsidy is against the provisions of the Act. Further as stated by KSEB, the 'affluence' of HT IV category cannot be accepted as a criterion for discrimination, which is against Section 62(3). Hence, the Commission is not in a position to accept such a proposal, especially in view of the fact that a revision for additional revenue has been found unjustified.

29. KWA is presently billed under industrial tariff both in LT and EHT. KSEB proposed 10% reduction in the tariff applicable to KWA. The proposal is also squarely against section 62(3) of the Act which provides that consumers cannot be discriminated. Hence, the proposal of KSEB could only be treated under section 65 of the Act. If the Government is willing to compensate KSEB for the shortfall in revenue due to reduction in tariff for KWA, the Commission will be in a position to consider the proposal. Since, KSEB could not produce any commitment on advance payment of subsidy by Government of Kerala, the Commission is not in a position to allow the proposal of KSEB. If such commitment from the Government of Kerala under Section 65 of the Act is available and the Government pays in advance, KSEB may be allowed to reduce the tariff as proposed.

30. KSEB also proposed to increase Bulk Supply Tariff (BST) applicable to licensees. The Commission in its Order dated 26-11-2007, effective from 1-12-2007 have revised the Bulk Supply Tariff (BST) applicable to the licensees. However, as per the order of Hon. High Court of Kerala, the tariff applicable to M/s KDHPCL was quashed. In the present proposal, the KSEB has proposed to increase the tariff for all licensees by 25%, stating the reason that licensees are making excess profit and the retail supply tariff revision would also fetch additional revenue to licensees. After the public hearing, the Commission convened a meeting of licensees along with KSEB on 30-9-2009 for discussing the proposal. All the licensees objected to the proposal of KSEB. According to the licensees, the increase in power purchase cost will be more than proportionate to the increase in revenue. Further they pointed out that the power purchase cost will be much higher than the retail tariff in the case of industrial consumers. Some licensees have suggested that they are ready to remit to KSEB the excess revenue collected in the event of revision of retail

tariff. In reply, KSEB pointed out that many licensee are earning much higher return, which is a reason for increasing the Bulk Supply Tariff. The Commission has considered the arguments of both sides. There is merit in the argument of KSEB that some licensees are earning extra profit. At the same time, the increase proposed by KSEB is unsustainable for licensees without proportionate revision in retail tariff. The Commission understands that the uniform retail supply tariff (RST) for most of the licensees and uniform Bulk Supply Tariff (BST) at voltage level, along with difference in consumer mix and load profile, are the reason for divergent profit levels for the licensees. As per the provisions of the Act, the licensees should earn regulated profit commensurate with their performance thereby ensuring financial viability. National Electricity Policy and Tariff Policy states that State Governments may assign the generating stations in accordance with the load profile of distribution companies so as to have uniform retail tariffs. Para 8.4.2 of Tariff policy states as follows:

> *"The National Electricity Policy states that existing PPAs with the generating companies would need to be suitably assigned to the successor distribution companies. The State Governments may make such assignments taking care of different load profiles of the distribution companies so that retail tariffs are uniform in the State for different categories of consumers. Thereafter the retail tariffs would reflect the relative efficiency of distribution companies in procuring power at competitive costs, controlling theft and reducing other distribution losses."*

31. The above provision clearly suggests that uniform retail tariff is to be preferred within a State. Para 5.3(a) of the Tariff Policy further provides that :

> *"The State Commission may consider 'distribution margin' as basis for allowing returns in distribution business at an appropriate time. The Forum of Regulators should evolve a comprehensive approach on 'distribution margin' within one year. The considerations while preparing such an approach would, inter-alia, include issues such as*

*reduction in Aggregate Technical and Commercial losses, improving the standards of performance and reduction in cost of supply".*

32. The distribution margin approach inter alia provides for regulation of distribution costs except power purchase cost, which needs to be addressed separately considering the loss level and consumer mix in each distribution area. The Commission is of the view that uniform retail supply tariff would be a preferable option within the State. In such a situation, licensees having better consumer mix could earn higher profit and vice versa. An increase in Bulk Supply Tariff is warranted if any licensee earns higher profits, at the same time the concerns of the licensees on financial viability should also be considered by the Commission. Hence, the Commission hereby orders that all the licensees shall file the ARR & ERC for 2010-11 in the month of December as provided in KSERC (Tariff) Regulations, 2003. The Commission would consider the ARR & ERC to determine the BST applicable to each licensee after following the due procedure. The proposal of KSEB on BST is deferred till then.

33. With the reasons stated above, the Commission disposes off by rejecting the proposal on rationalisation/revision of domestic tariff, HT IV Commercial, tariff reduction for KWA and deferring the proposal on revision of bulk supply tariff of KSEB.

34. The Commission having taken a decision against the proposal of tariff revision/ rationalisation, convened a meeting on 28-10-2009 of the Chairman & members of the Board as envisaged under proviso to Section 64(3) of the Act. The meeting was attended by the Chairman, Member (Finance) & Member (D&T) of KSEB. The Commission described the reasons for rejecting the proposal as mentioned above. KSEB reiterated their arguments for justifying their proposal and remarked that the Commission is at liberty to revise the proposal under Section 64(3)(a).

## SECTION 2. RATIONALISATION OF TOD TARIFF

### A. <u>ToD Tariff for HT-EHT consumers</u>

35. KSEB proposed a change in ToD tariff for HT/EHT consumers to address the complaints of stakeholders and consumers. Many consumers have complained that the present system is complex and less sensitive to shifting of load. As against the present scheme, KSEB proposed a relatively simple procedure, ie., 40% and 30% respectively as penalty for demand and energy charges for peak time and incentive of 15% on demand charges and 10% for energy charges during off-peak hours. Further, demand charges for exceeding the contract demand is proposed as 100% extra. The proposed scheme by KSEB is as follows:

Billing of the demand charges:

(a) Billing demand for Normal time (6:00 hours to 18:00 hours) shall be:
*Billing Demand during normal time x Ruling Demand Charge /kVA x 12/24*

(b) Billing demand for Peak time (18:00 hours to 22:00 hours)shall be:
*Billing Demand during peak time x Ruling Demand Charge /kVA x1.40x 4/24*

(c) Billing demand for Off-peak time (22:00 hours to 6:00 hours) shall be:
*Billing Demand during off-peak time x Ruling Demand Charge /kVA x 0.85x 8/24*

Total demand charges = (a) + (b) +(c)

*Other conditions*

(i) The billing demand in each time zone during a month shall be the recorded maximum demand in any time zone or 75% of the contract demand, which ever is higher.
(ii) Ruling Demand Charge is the normal ruling rate as per the tariff schedule

**(iii)** The Excess demand charge, when the billing demand during any of the time Zone exceeds the contract demand, shall be : Excess demand x Ruling demand charge/ kVA

Billing Energy charges:

The billing of the energy charge for HT&EHT consumers may be done as follows

*a)* Normal time: *Consumption during normal time x ruling energy rate / unit.*

*b)* Peak time : *Consumption during peak time x ruling energy rate / unit x 1.30*

c) Off-peak time : Consumption during off-peak time x ruling energy rate/unit x 0.90

Total energy charge during a month = (a)+ (b)+ (c)

According to KSEB, when compared to the present TOD tariff, the proposed TOD tariff is simple and easy to adopt and encourages reduction in peak consumption and promotes off-peak consumption.

**Response of Consumers:**

36. Consumers in general appreciated KSEB for the rationalisation of the present system of ToD. However, many consumers opined that the proposed scheme is unscientific. According to the Kerala HT&EHT Industrial Electricity Consumers Association, as per the proposed scheme, some consumers have to pay more than Rs.1 crore and those who do not shift the load would stand to gain. They have pointed out that as against the penalty of 40%, incentive is only 15% on the demand charges. They demonstrated that in the case of uniform load, the proposed scheme is beneficial, but when consumption during peak is reduced by 20% and off peak is increased by 10%, the proposed system would increase the average tariff by 6 ps/kWh compared to existing tariff. If load shifting is more, then this disparity is found to increase. According to them, in West Bengal, penalty is 40%, but incentive is 36%. Alternatively, they have proposed a scheme where maximum demand is billed at normal rates and energy charges are billed at 40% extra during peak hours and 40% less during off-peak hours. They have also objected to the proposal to charge 100% extra for excess demand. In addition to the above, Shri. A R Satheesh, Carborandum Universal Limited has suggested to dispense with minimum billing during peak

hours. Kerala Catholoc Engineering college Managements' Association stated that 15% incentive and 40% penalty for demand charges is unfair. To them, penalty and incentive should be equal. They have also objected to the increase in excess demand charges. M/s Hindustan Organic chemicals stated that off peak excess demand shall be increased to 120% of contract demand. M/s Western India Plywoods Limited, M/s ITI limited, M/s. Balus Polymers, Ernakulam, M/s FACT, M/s. Kerala Electrical and Allied Engineering Co limited, M/s Mathrubhumi Printing and Publishing Company limited, M/s TCC Limited, M/s Sree Sakthi Paper Mills, M/s Travancore Tinanium Products Limited, MRF limited, FACT Employees Associations, Save Fact Action committee, HOCL Joint forum of trade unions, The Travancore-cochin Chemicals Employees Association, Bharathiya Mazdoor Sangh, Kerala State 'A' Grade Electrical Contractors Association, Standing Council of Trade Unions, Indal Workers Association, , Carborandum Universal Employees Union, Mahila Rashtriya Jantha dal, Cominco Binani Zinc Employees Association, Binani Zinc Employees Association, Titanium General Labour Union and several other organisations and individuals expressed similar opinion.

37. M/s Southern Railways stated that Railways are to be excluded from excess rate during peak. Shri. George K K, proposed incentive of 30% and penalty of 30%. Excess demand charges to be 50% of normal rates. M/s Binani Zinc limited stated that their bill would increase by Rs.2.29 Crore on excess bills on an annual basis.

38. The HT-EHT Association also raised the demand that the present calculation of power intensive consumers are faulty and to be rectified. They also demanded that sample calculation of billing of power intensive consumes is to be published by KSEB.

**Analysis and decision of the Commission**

39. The Commission has done an analysis of the data provided by KSEB. KSEB has provided a sample of 35 EHT units and 29 HT units for showing the impact of proposed ToD tariff. KSEB has not given any specific reason for selection of the sample units. The data set pertains to 2007-08 year, which could be treated as

a representative year, since there was no power cut or load shedding during that year. Further, 2007-08 is also considered as a good year in terms of performance of the industrial sector as a whole. Hence, the Commission is of the view that the choice of the year 2007-08 is justified. Based on the sample data, it was demonstrated by KSEB that the additional revenue due to new ToD was almost nil, showing that the new proposal is revenue neutral but having the benefit of a simplified procedure. As per the data provided, the average peak demand of the sample consumers is 78% of the normal demand for HT and 79% for the EHT. Similarly, the average off peak demand is about 86% of the normal demand for HT and 105% for EHT, showing that EHT consumers have higher off peak load compared to HT consumers. The average load factor for HT is 42% and 62% for EHT. On a time zone basis, for about 62% of the EHT consumers' Load factor for normal period is higher than average load factor during that period. Similarly 39% of HT consumers have load factor higher than average. The Commission has considered these basic characteristics of the sample units in its analysis.

40. The major limitation of present ToD structure is that it is complex. However, the existing structure ensures certain stability in revenue by its design. The main argument of the objectors on the proposed structure is that the incentives are designed in such a way that shifting of load from peak to off peak results in increase in average cost. The data provided by KSEB shows that estimated bills based on the proposed rates are lower when the off peak load is lower and estimated bills are higher than the present bill, when the off peak load is higher. This is visible in the case of both EHT and HT consumers. Based on the data provided by KSEB, in 29% of the EHT cases, the off peak demand is higher than the normal demand, but the bill amount as per the proposed scheme is higher than existing rates. In 37% of the EHT cases and 52% of the HT cases, the proposed rates are lower even if there is low off peak demand. This may be due to the structure of present ToD system, which ensures certain stability in revenue irrespective of shifting of load. However good design of ToD rates should incentivise increase in off peak load and disincentivise increase in peak load.

41.There are different schemes of ToD tariff implemented in different States. In some states, differential tariff is applied to energy rates only, where as in some cases, it is on a percentage basis and in others a fixed paise/kWh basis incentives and disincentives are provided. However, the Commission is inclined to stick to the basic structure of ToD scheme proposed by KSEB as it is simple to implement. However, considering the limited incentives for load shifting for the proposed scheme, the Commission decides to increase the incentives mainly aiming encouraging off peak consumption thereby enabling shifting of load from peak to off peak. The Commission also notes that analysis of past data to predict the response of industries to the approved ToD rates have limited use mainly because, industries may respond to new rates in a different way ie., historical data is the result of existing ToD structure, the same usage pattern may not follow in the new incentive structure. The Commission is also in favour of the suggestion made by some of the respondents to dispense with the minimum billing demand for peak hours to encourage peak shifting.

42.Accordingly, the following rates are approved as ToD tariff for HT and EHT consumers. There is no change in the method of billing proposed by KSEB except changes in incentives/disincentives and the conditions mentioned in this order.

| | Rates proposed by KSEB (% of Ruling Charges) | | | Rates approved by KSERC (% of Ruling Charges) | | |
|---|---|---|---|---|---|---|
| | Normal period (6:00 hrs to 18:00 hrs) | Peak period (18:00 hrs to 22:00 hrs) | Off peak (22:00 hrs to 6:00 hrs) | Normal period (6:00 hrs to 18:00 hrs) | Peak period (18:00 hrs to 22:00 Hrs) | Off peak (22:00 hrs to 6:00 hrs) |
| Demand Charges | 100% | 140% | 85% | 100% | 140% | 80% |
| Energy Charges | 100% | 130% | 90% | 100% | 130% | 85% |

**Other conditions:**

- Ruling demand/energy charges shall be the normal period demand/energy charges as per notified tariff.

- Billing demand in normal and off peak period during a month shall be the recorded maximum demand or 75% of the contract demand whichever is higher. Billing demand for peak hours shall be the recorded maximum demand.

- Excess demand charges: Excess demand charges shall be applicable to the recorded maximum demand in excess of contract demand during normal period and peak period, which shall be charged **at 50% extra** (ie., excess demand during normal/peak period x ruling demand charges x 0.5). Excess demand charges during off-peak period shall be applicable only if the recorded maximum demand during off peak period is in **excess of 130%** of the contract demand.

- For Power Intensive industries which are allocated power on or after 17-12-1996, the energy consumed during peak time shall be charged 100% over the ruling energy charges at normal time only instead of applicable ToD energy charges during peak period. This will apply to additional power required by the existing power intensive industries also.

43. As pointed out, since the impact of peak shifting is difficult to assess, the Commission hereby directs that KSEB may in appropriate intervals (monthly or quarterly), in any case not later than 6 months, study and report before the Commission the impact of approved TOD tariff on peak shifting and on the revenue. Further, KSEB may approach the Commission with all supporting materials, if the approved tariff have substantial financial or any other adverse impacts. Since many consumers have complained on the billing of power intensive consumers, **the Commission directs that the procedure for billing for power intensive consumers with a sample calculation based on the approved scheme shall be furnished to the Commission within one month of this order**.

### B. <u>ToD tariff for LT Consumers</u>

44. KSEB in its tariff proposal suggested to introduce ToD tariff for LT industrial consumers. According to KSEB, there are about 1.25 lakh connections in LT

industrial category having a consumption of 1092 MU. The average monthly consumption is about 720 units per consumer and the average connected load is about 11kW. Since majority of the consumers have peak load consumption, methods to shift the load from peak hours would be beneficial for the system. Hence the proposal for ToD is introduced. Further, KSEB stated that it is not possible to introduce ToD tariff for all the consumers at one stretch and proposed to introduce initially on a selective level for consumers having connected load above 50kW. KSEB also proposed that the consumers have to install the meters at their cost.

45. In order to attract the consumers to ToD system, the KSEB proposes to have 10% rebate over the normal rates for off-peak hour energy consumption and 20% penalty for consumption during the peak. For the demand charges 25% penalty during peak hours and 15% incentives during off peak hours is suggested. The proposed rates are as follows:

Energy charges :

- Normal time : Rs. 3.25/kWh from 6:00 hrs to 18:00 hrs
- Peak hours : Rs. 3.90/kWh from 18:00 hrs to 22:00 hrs
- Off peak hours: Rs.2.93/kWh from 22:00 hrs to 6:00 hrs next day

Demand charges :

- Normal time : Billing demand during normal time (from 6:00 hrs to 18:00 hrs ) X Rs. 45/kVA X 12/24
- Peak hours : billing demand during peak hours (from 18:00 hrs to 22:00 hrs) X Rs.56 X 4/24
- Off peak hours: billing demand during off peak hours (from 22:00 hrs to 6:00 hrs next day) X Rs.38.25 X 8/24

The billing demand during any time during the month shall be the recorded maximum demand or 75% of the contract demand which ever is higher.

**Response of the stakeholders**

46. LT industrial consumers in general welcomed the proposal of KSEB for introduction of ToD. However, some consumers demanded that instead of 50kW, the limit should be reduced to 20kW for opting for ToD system. The

Kerala State Small scale Industries Association stated that ToD may be introduced as an option and also to be implemented from 20kW onwards. KSEB shall provide the meters and only class 1 accuracy meters to be used for ToD. They have also demanded that requirement of separate meters for lighting and power load may be dispensed with. According to them incentive for off peak hours needs to be increased and about 120% of the maximum demand may be allowed to be used in off peak.

**Analysis and decision of the Commission:**

47. The Commission analysed the proposal of KSEB in detail. KSEB has stated that considering the availability of data, impact of ToD was not analysed. Further ToD was limited only to industrial consumers and also consumers having connected load above 50kW. Further KSEB proposed existing tariff of Rs.45/kW as the base rate for ToD which is billed at Rs./kVA basis without considering the power factor. Hence, prima facie, the present proposal leads to reduction in revenue to KSEB by design of demand charges. The Commission is of the view that before introducing ToD, there shall be a system of billing based on Maximum Demand. In any case, introduction of ToD compliant meters enables billing based on maximum demand. Further ToD is designed for shifting or reducing the peak load, which ideally should be extended to all consumers having demand during peak time.

48. Historically, in the absence of meters or high cost of meters capable of measuring ‘demand’, fixed charges for LT consumers are charged based on the connected load of the consumers, though connected load for most practical purposes are not used for system planning. The Commission receives number of complaints on the changes in connected load related issues in the case of LT consumers, where fixed charges are levied based on connected load. Further, as per the provisions of Electricity Act, 2003, even inadvertent changes in connected load would amount to unauthorized load. This problem to a certain extent can be avoided by introducing tariff based on contracted demand or maximum demand in place of connected load. In such cases as in the case of HT/EHT consumers, the contracted demand shall be treated as connected load for those who opt for maximum demand based tariff in LT. In any case, it is a

precondition that maximum demand based tariff is required for introduction of ToD tariff. Unlike in the past, with advancements in information technology and metering technology, and reduction in cost of meters, meters recording maximum demand are commonly available. Even ToD compliant meters are available at affordable prices. In such a situation, Commission is of the view that it is possible to introduce maximum demand based tariff for LT consumers who are billed for fixed charges based on connected load.

49. As pointed out by the KSEB, due to lack of data it is impossible to estimate the impact of ToD tariff on the revenue. Hence the Commission is of the view that, initially, maximum demand based tariff may be introduced **as an option for LT IV (industrial), LT VII A(Commercial) and LT VII C (Commercial)** consumers having connected load of 20kW or above, paying fixed charges based on connected load. As suggested by KSEB, consumers willing to replace the meters at their cost shall be allowed to opt for this tariff initially. The Commission is also aware that while proposing such an option, revenue stream of the licensees needs to be balanced and tariff to be attractive for the consumers to migrate to the new system.

50. Based on the ARR submitted by the KSEB for the year 2009-10, Connected load and fixed charges collected per month are given in the table below. The fixed charges converted to kVA assuming 50% of the connected load as maximum demand and 0.8 as Power Factor, equivalent rate in Rs./kVA to maintain the revenue from fixed charges are given in the last column.

**Estimated revenue from fixed Charges for LT consumers (ARR for 2009-10)**

| Consumer Categories | Connected load (MW) | Existing rate (Rs./kW) | Estimated revenue from Fixed charges per month (Rs. Crore) | Equivalent Rs./kVA* |
|---|---|---|---|---|
| LT IV (Industrial) | 1315 | 45.00 | 5.92 | 72 |
| LT VII (A) (Commercial) | 485 | 100.00 | 4.84 | 160 |
| LT VII (C) (Commercial) | 132 | 80.00 | 1.06 | 128 |

*Estimated assuming 50% of the connected load as maximum demand with 0.8 PF

Based on the above premise, as an initial step, optional maximum demand based tariff for LT consumers are approved as follows:

**Optional Maximum demand based tariff**

Eligibility : Optional Scheme for LT IV Industrial, LT VII (A) &(C) Commercial, having Connected load more than or equal to 20 kW.

Billing demand: Recorded maximum demand or 75% of the contract demand whichever is higher

Demand charges : In place of fixed charges based on Rs./kW of connected load, Rs./kVA of billing demand as per tariff mentioned in the table below.

| | *Demand charges* | |
|---|---|---|
| | Existing Tariff | *Approved Tariff* |
| Consumer Categories | Fixed charges Rs./kW of connected load per month | *Rs./kVA of billing demand per month* |
| LT IV (Industrial) | 45 | *75* |
| LT VI I(A) (Commercial) | 100 | *160* |
| LT VI I(C) (Commercial) | 80 | *130* |

Energy Charges: Existing energy charges of respective categories shall apply.

**Other conditions**

- The optional maximum demand based tariff shall be effective from 1st April 2010.
- Consumers who opt for maximum demand based tariff have to install ToD compliant meters at their cost. Meters may be arranged by KSEB or the Consumers. If the consumers provide meters it has to be got tested at

KSEB's lab or at Electrical Inspectorate. It will be the responsibility of KSEB to ensure the accuracy of the meters after proper testing.

- For those who opt for maximum demand based tariff, the contract demand shall be treated as connected load.
- The consumers who opt for maximum demand based tariff shall declare the contract demand in kVA by executing a supplementary agreement showing the contract demand and details of connected load in their premises.
- The consumers who opt for the new system may be allowed to revise upwards or downwards the declared contract demand within six months from the date of option without any conditions or charges. After this, the usual terms and conditions shall be applicable for changing contract demand.
- The Billing demand shall be the recorded maximum demand or 75% of the contract demand which ever is higher. In case the billing demand exceeds the contract demand, excess demand shall be charged 50% extra.

KSEB may any time approach the Commission for removing any difficulties in the implementation of the scheme. KSEB is also free to approach the Commission if other categories also are to be included as part of the scheme.

**ToD tariff for LT industrial consumers**

51. Based on the proposal of KSEB and the response of stakeholders, the Commission approves following ToD scheme as an optional scheme for LT industrial consumers who have opted maximum demand based tariff and having contract demand of 30 kVA and above.

| | Rates proposed by KSEB (% of Ruling Charges) | | | Rates approved by KSERC (% of Ruling Charges) | | |
|---|---|---|---|---|---|---|
| | Normal period (6:00 hrs to 18:00 hrs) | Peak period (18:00 hrs to 22:00 hrs) | Off peak (22:00 hrs to 6:00 hrs) | Normal period (6:00 hrs to 18:00 hrs) | Peak period (18:00 hrs to 22:00 Hrs) | Off peak (22:00 hrs to 6:00 hrs) |
| Demand Charges | 100% | 125% | 85% | 100% | 125% | 85% |
| Energy Charges | 100% | 120% | 90% | 100% | 120% | 90% |

**Other conditions**

- The ToD scheme shall be effective from 1st April, 2010. KSEB shall make all arrangements for introduction of the scheme by the stipulated period.
- Ruling demand/energy charges shall be the normal demand/energy charges as per notified tariff
- Billing demand in normal and off peak period during a month shall be the the recorded maximum demand or 75% of the contract demand whichever is higher during normal/off peak period. Billing demand for peak period shall be the recorded maximum demand.
- Excess demand charges: Excess demand charges shall be applicable to the recorded maximum demand in excess of the contract demand during normal period and peak period, which shall be charged **at 50% extra** ie., excess demand during normal/peak period x ruling demand charges x 0.5. Excess demand charges during off-peak period shall be applicable only if recorded maximum demand during off peak period is in **excess of 130%** of the contract demand.

52. The Commission also directs that, KSEB may any time approach the Commission for removing any practical difficulties in the implementation of the scheme. KSEB is also free to approach the Commission if other categories also are to be included as part of the scheme. A detailed study of the impact of the scheme may be submitted immediately after 6 months from the

introduction of the scheme with necessary proposals for amendment if any showing revenue implication, impact of load shifting etc.,

## SECTION 3. TARIFF RE-CATEGORISATION

53. KSEB in its proposal suggested re-categorisation of some of the consumer categorises. KSEB has requested to include the Akshaya e-centres under LT IV Industrial from the present LT VI(B) non-domestic category since the Government has suggested such a change. Another proposal of the Board is to reduce the demand charges applicable to electric crematoria which are billed under industrial category. KSEB suggested that considering the high connected load and low consumption pattern the demand charges applicable to electric crematoria in LT to be reduced from Rs. 45/kW to Rs.30/kW and Rs.270/kVA to Rs.180/kVA in HT. The cardamom drying and curing units are presently billed under LT IV industrial category but are not mentioned in the tariff schedule. KSEB suggested that such units may be included in the schedule of tariff under LT IV industrial. In the case of LPG bottling plants, the Commission vide its order dated 19-3-2009 had included them under LT VII(A) tariff. KSEB requested that all LPG bottling plants with HT connection may be billed under HT IV commercial and LT connections to be brought under LT VII (A).

54. KSEB has also stated that at present blood banks under IMA/Govt Hospitals/LSGs are billed under LT VI(A), the same should be included in the schedule. KSEB requested that seafood processing units with LT connections should be included in LT IV industrial category in the light of the Commission's Order dated 23-4-2009. Regarding Home Stay units, KSEB suggested that Homestay units approved by the Department of Tourism billed under LTVII(A), may be directed to install sub meters for the portion of 'Homestay'. If submeters are not installed the entire consumption shall be billed under LTVII(A).

55. The photo studios are not included in the tariff schedule, but are billed under LT VIIA. KSEB requests that all photo studios with or without colour photo printing be included under LT VII(A) commercial tariff. Similarly, agricultural nurseries without sale are categorised under LT IV industrial tariff. KSEB

suggested that Nurseries with sale be categorised under LT VII(A) commercial tariff. LT VII(A) tariff is applicable to filtering, packing units using extracted oil brought from outside. KSEB suggests that if the activities such as filtering, refining, bottling, packing etc., are carried out in the same premises with extraction also being done under the same service connection, the entire consumption should be billed under LT IV tariff. KSEB has also suggested that Gymnasiums should be treated at par with sports club, sailing/swimming activities billed under LT I(b) and LT VII(C). The ATM counters are also not included in the existing tariff notification, KSEB requests that it should be included under LT VII(C).

56. Further, KSEB has suggested that penalty for billing demand exceeding contract demand shall be treated at par with unauthorised use of electricity and the same is to be billed at 200% extra instead of 150% existing at present.

**Analysis and decision of the Commission**

57. The Commission has examined the proposals on the recategorisation by KSEB. Only few consumers have expressed their opinion on re-categorisation. Kerala Colour Lab Association has objected to the proposal of KSEB on the ground that the colour processing units in the State would become unviable which will affect thousands of workers depending on it. They have also pointed out that studios with connected load less than 1000 W alone are at present charged under LT VII (B) and thus, should continue.

58. In the present proposal, KSEB suggested that Akshaya e-centres are to be classified under LT IV industrial from LT VI (B) non-domestic. However, this proposal is squarely against the request made by KSEB vide letter KSEB/TRAC/ Comp(R)/12/05/378 dated 10-6-2009. In the letter dated 10-6-2009, KSEB informed that there is no industrial process/manufacturing activity carried out in any one of the above premises. But only activities such as computer training, teaching, e-remittance, e-filing etc., are carried out in exclusive Akshaya Centres. In some cases, activities such as Photocopying, Internet browsing, sales of stationary articles, mobile phones recharging etc., are also entertained. The Board also stated that considering the nature of activities, the

present tariff of LT-VI (B) should be retained for Akshaya Centres considering them as offices and institutions under the State/Central Government. In the present proposal, KSEB has not stated that the activities in the Akshaya centres have been changed to warrant industrial tariff. Considering the activities reported on Akshaya centres, the Commission is of the view that the units are to be continued to be billed under LT VI (B).

59. The proposal for reducing the tariff for electric crematoria would only be treated at par with the reduction in tariff for KWA. Hence, in the absence of any commitment under Section 65 of the Act, the same cannot be allowed as per the provisions of the Electricity Act, 2003.

60. The Commission is of the view that the request of KSEB regarding cardamom drying and curing units, can be allowed to be billed under industrial activity, as it is part of cardamom processing. Hence, 'cardamom drying and curing units' shall be included in LT IV Industrial category, subject to introduction of ToD metering for effective Demand Side Management.

61. Regarding Home stay, the Commission feels that the request of KSEB needs to be further studied ascertaining the views of Tourism industry also. The matter is deferred.

62. Regarding the request of filtering and packing units, the extraction of oil is at present billed under LT IV industrial (Oil mills). The Commission in its order dated 18-3-2009 categorised filtering and packing units using extracted oil brought from out side under LT VII(A). Hence, the Commission is of the view that the request of KSEB be allowed and orders that if the activities like filtering, refining, bottling, packing etc., are carried out in the same premises where extraction of oil is also being done under the same service connection, it shall be billed under LT-IV Industrial Tariff. Similarly, the request of KSEB on Gymnasium is also allowed. In the case of Agricultural nurseries with sale, existing tariff schedule comes under LT VII (A). Based on the request of KSEB, the ATM counters of Banks will be billed in the same tariff applicable to Banks. Regarding colour photo printing, at present SSI units engaged in computerised

colour photo printing are included under industrial tariff. Hence, the Commission is of the view that present system need not be disturbed.

63. In the case of LPG bottling plants, Blood Banks of IMA/Govt Hospitals/Local Self Governments, and Sea food processing units, the Commission is of the view that detailed examination is necessary and hence decides that the present system shall continue till further orders.

**Orders of the Commission**

a) Based on the above, the Commission disposes of the petition by rejecting the proposal on rationalisation/revision of tariff proposed by KSEB for Domestic consumers, Kerala Water Authority, HT-IV Commercial, deferring the proposal on Bulk Supply Tariff applicable to licensees as mentioned in the Order.

b) The Time of Day Tariff for HT-EHT consumers is approved as given in para 42 and 43 of this order, which shall be effective from 1-1-2010. In the case of power intensive consumers in HT-EHT category energy charges in the peak hours shall be taken as two times ruling tariff during normal hours instead of 140% applicable to non power intensive consumers.

c) Maximum demand based tariff shall be introduced for LT Industrial and LT VII (A) & (C) consumers having connected load 20 kW and above as an optional scheme. The scheme shall be effective from 1-4-2010.

d) ToD tariff is approved as an optional scheme for LT Industrial consumers who have opted for maximum demand based tariff and having 30 kVA contract demand. The scheme shall be effective from 1-4-2010.

e) Akshaya Centres shall be continue to be billed under LT VI (B) and cardamom drying and curing units shall be billed under LT IV industrial with TOD metering. The filtering and packing units using extracted oil brought from out side shall be billed under LT VII(A) and in case, extraction of oil and activities such as filtering, refining, bottling, packing etc., are carried out in the same premises with the same service connection, shall be billed under LT-IV

Industrial Tariff. Gymnasiums shall be billed under respective LT I(b) and LT VII (C) based on connected load. Tariff applicable to ATM counters of banks shall be the same as that applicable to banks. All other recategorization proposals are deferred.

f) KSEB shall furnish the terms and conditions of tariff incorporating the changes approved in this order within one month for approval before publishing the same under Section 45(2)(b).

| Sd/- | Sd/- | Sd/- |
|---|---|---|
| **M.P.Aiyappan** | **C. Abdulla** | **K.J. Mathew** |
| **Member** | **Member** | **Chairman** |

**Approved for Issue**

**Sd/-**
**Secretary**

**ANNEXURE I**

## A. LIST OF PERSONS ATTENDED THE PUBLIC HEARING

INSTITUTION OF ENGINEERS HALL, THIRUVANANTHAPURAM ON 09-09-09

1. M.G. Rajan, MRF Ltd., Kottayam
2. John Mathews, Manager, H.N.L.
3. Shaji Sebastian, Convener, KSSIA
4. Biju, Vice President, KSSIA, Thiruvananthapuram
5. Abubekar, Sumayya Polyplast Industries
6. Paul George, NCC Road Residents Association
7. A.P. Joseph, NCC Road Residents Association
8. Salahudeen, INTUC, Titanium
9. P. Sahu, INTUC, Titanium
10. P.M. Srikrishnan, Executive Director, KDHPCL
11. T. Bijukumar, Dist. Secretary, KSSIA, TVM
12. T.V. Madhavankutty, President, Kerala Color Labs Association
13. Jibu Tom, Kerala Automobiles Limited
14. Joseph Thomas, Palode Paper Mills, TVM
15. Jijo Kuriakose, Binani Zinc Ltd., Cochin
16. K.V. Rajendran, General Manager, Technopark
17. V.M. Rajan, General Secretary, C.B.Z.E. Union
18. P.P. Joy, General Secretary, C.B.Z.E. Union
19. M.A. Shaji, General Secretary, C.B.Z.E. Union
20. Raghavan. P.P., HNL
21. Prasad.S, AEE/TRAC/KSEB
22. Kurien Varghese, CE (C&T), KSEB
23. V. Ramesh Babu, Dy. CE, TRAC, KSEB
24. N. Viswanath
25. Pankaj Jaiswal, Sr. DEE, TVM Division, Southern Railway
26. Haridas
27. Rochy. M.C., Consumers' Forum
28. Edward. P.B., KSEB
29. Meharunnisa. M, KSEB
30. P. V. Manjula, KSEB
31. B. Pradeep, KSEB Officers Association
32. G. Sreekumar, KSEB Officers Association
33. Ayyappan Nair. A, General Secretary, Consumer Vigilance Centre, TVM
34. K.P.V. Menon, Consumer Vigilance Centre, Trivandrum

35. Rinu George, Travancore Titanium
36. Jayan, CITU, TTPL,
37. K. Thankappan, Peroorkada
38. J.K. Mujeebul Rehman, Solidarity
39. P. Naseer Khan, Solidarity
40. Renju. G, Sreerag Video Lab, Karunagappally
41. Suresh Kumar. K, Thunduvila, Pallichal
42. Jimmy Abraham, KCMMF (Milma)
43. Ramakrishna Pillai, Consumer Vigilance Centre.

## MUNICIPAL TOWN HALL, KALAMASSERY ON 16-09-2009

1. George Thomas, President, EHT & HT Association
2. Shaji Sebastian, KSSIA
3. Raveendran & Shiju. M.P., Kerala Hotel & Restaurants Association
4. G.N. Mohan, TCC Ltd., Udyogamandal
5. B.V. Chandrasekar, Chief Engineer, Electrical, S. Railway
6. A. R. Satheesh & R. Madhavan Nair, Caoborundum Universal
7. Bhadarudin. T.H., KSSIA
8. S. Jayathilakan, EHT Association
9. K.V. Pushkaran, TCC Ltd.
10. K.R. Vijayan, TCC Ltd.
11. R. Rajeev, Chief Engineer, TCC Ltd.
12. Ahmed Kunju
13. Aliar, Plywood Association
14. Ram Das, Caoborundum Universal
15. P.S. Gangadharan, Standing Council of Trade Unions
16. Alupuram Zakeer, Convener, Standing Council of Trade Unions
17. K.K. Chandran, G. Secretary, AICTU
18. K.A. Joseph, President, Edayar Ind. Association
19. Louis Francis, Kerala Color Lab Association, Ernakulam Chapter
20. Manohar Prabhu, Kalamassery Development Association
21. K.K. George, Consulting Engineer
22. K.S. Gopalakrishnan, Aluva Ind. Dev. Area Association
23. Dejo Kappen, Centre for Consumer Education
24. Jiji Kuriakose, Binani Zinc Ltd.
25. M. Sambasivan, AFWU
26. V. Sreekumar, Hindalco
27. Lingon Joshi, Binani Zinc Ltd.
28. P.P. Joy
29. Varkey Peter, Secretary, Rice Mill Association
30. K.N. Ravindran, Vice President, INTUC, HNL

31. K.S. Sanal Kumar, Secretary, HNLEA
32. P. Suresh, Vice President, CITU, HNL
33. P.I. Joy, KSSIA
34. A.J. Xavier, Binani Zinc Ltd.
35. P.C. Markose, Edappally Senior Citizens' Forum
36. C.S. Sivaprasad, Binani Zinc Ltd.
37. Raju Kuriyan, C.V.C.
38. M. Asokan, Gijas Rubber, Edayar
39. Arul Chandran, Binani Zinc Ltd.
40. George Joseph, M.D., Rubber Park India.
41. N.R. Ragesh Kumar, Binani Zinc
42. P.A. Subair, Binani Zinc
43. V.M. Rajan, Binani Zinc
44. P.K. Manoj, Binani Zinc
45. Sandu Joseph, Secretary, The Seafood Exporters Association of India
46. K.B. Muraleedharan, Binani Zinc
47. K.O. Antappan, Secretary, Caoborundum Universal Employees Union
48. M. Suresh, CULU, Koratty
49. Bose. V. Jose
50. B.P. Stephen, Binani Zinc
51. M.C. Bobby, Kerala Film Exhibitors Federation
52. Sumesh Shenoy, Treasurer, GenSet, Cochin
53. M.R.P. Bhatt, Mangala Marine Exports Pvt. Ltd.
54. G.P. Nair, Sreevas Exports
55. P.P. Raghavan, Secretary, Eng. Assn. HNL
56. K.F. Joseph, Premier Tyres Employees Union
57. B. Chandrasekaran, Hindalco
58. Kurian Varghese, CE, KSEB
59. V. Ramesh Babu, Dy. C.E., KSEB
60. P.V. Sivaprasad, Executive Engineer, KSEB
61. Shajan Joseph
62. Balakrishnan. M.P., Balus Polymers
63. N.S. Anilkumar, Binani Zinc
64. V.N. Satheesan, L.R.E. Ltd.
65. Raju Kuriyan, Consumer Vigilance Centre
66. J. John
67. Shijo. T. Paul, Perumbavoor
68. Abraham Sebastian, Copper Blues
69. G.R. Prasad
70. T. Gangadharan, Cochin Port Trust
71. Abdul Rahim, Cochin Port Trust
72. Girijasan, GRO Enterprises, Cochin – 5
73. K. Kunjali, Cochin Port Trust
74. K. Poothapandi, Cochin Port Trust
75. Shiju. M.P. K.H.R.A

76. Binny. P.J., FACT, Udhyogamandal
77. T.V. Chandran, Asst. Dev. Commissioner, CSEZ
78. Haridas. K. Varma, Exe. Secretary, CSEZ Industries Association
79. P.P. Mahanta, KDHPCL, Munnar
80. R. Jeyaraman, KDHPCL, Munnar
81. S.A. Ajims, Solidarity Youth Movement
82. P.S. Ashraf, FACT (CD) Employees Union, CITU
83. Girish. V. Nair, Appollo Tyres Ltd., Kalamassery
84. Aneesh. R, Appollo Tyres Ltd., Kalamassery
85. T.M. Abdul Reheman, Binani Zinc
86. Joy. P. Thomas
87. Sudheer, KEL
88. A.P. Joy, KEL
89. S. Brehmakumar, Maveli Colour Lab, Haripad
90. V.A. Anverjan, KEL
91. J. Ravindranathan, AIMS, Ponekkara
92. R. Rahesh Kumar, Asst. Secretary, Thrissur Corporation
93. K.M. Micheal, EE, Trissur Corporation
94. Shanmukhan. C, TCED, Thrissur
95. Dileep. V. Paul, Residents Engineer, KINFRA
96. V. S. Noushad, Noble Engineering, Edayar
97. G. Venugopal, HOCL, Ambalamugal
98. Abhilash. S, Mathrubhoomi, KOCHI
99. K.K. Jinnas, INTUC
100. Joseph Jude
101. M.N. Menon, Periyar Beverages
102. K.S.B. Pillai, V. President, Regd. App. Council, Maradu
103. C.S. Sunil, KSEB Officers Association
104. Suresh Kumar. M, KSEB Officers Association
105. Ajit.K. Das, Bhavana Colour Lab.
106. Shaji.M. Babu, KSEB Officers Association
107. Residence Appex Council, Ernakulam
108. K.S. Dilip Kumar, RACE
109. Kuruvilla Mathews, Secretary, Kerala Congress
110. Krishnan Nair, Bros. Colour Lab
111. P.B. Ismail, CUMI
112. Ivan , EE, KSEB, Sub Division, Mattancherry
113. Adv. Jose Vithayathil, President, CVC
114. R. Saji Kumar, BMS, FACT
115. M.M. Jabbar, FACT Employees Association
116. P. Vijin, General Secretary, FACT Workers Union
117. Ratheesh. K. Pai, SSPML, Edayar
118. Sojan Kunjachan, CMRL, Edayar
119. K.K. Pavithrarajan, HOCL, Ambalamugal
120. K.K. Rajan, HOCL, Ambalamugal

121. K.K. Vinodhkumar, HOCL, Ambalamugal
122. T.K. Vidyasagar, HOCL, Ambalamugal
123. S. Balasubramony, CSEZ
124. P.A. Anilkumar, HINDALCO
125. M.A. Thomas, HINDALCO
126. Sebastian. V.J., Binani Zinc
127. O.P. Rajan, KEL
128. M.P. Salin, KEL
129. Edappally Basheer
130. C.S. Paul

## TOWN HALL, MANANCHIRA, KOZHIKODE ON 22-09-09

1. N.B. Krishnakumar, President, Hotel & Restaurant Assn. Kozhikode
2. Valsan Nellikode, President, Samsthana Upabhokthru Vedi
3. Shalu, Manager, Prompt Assay, Calicut
4. K.T. Ajith, Kerala Colour Lab Associations
5. T.C. Narayanan, Retd. AO, AG's office, Hyderabad
6. Kurian Varghese, C.E. (C&T), KSEB
7. Sivaprasad, EE, TRAC, KSEB
8. R. Remony, Member i/c, CGRF, Kozhikode
9. Shamsuddin. K.T., EE, KSEB, Feroke
10. E.Manoj, KSEB Officers Association
11. U. Mohanan, CE, Distribution North, Kozhikode
12. Bose Jacob, EE, Electrical Division, Kozhikode
13. A. Ahammed Koya, General Manager, The Western India Plywoods

Ltd.

14.K. Mohanan, Kozhikode

15.C. Sajith, Kozhikode

16.M.K. Sivanandan

17.Darsan Vinod, A.K.P.A., Kozhikode

18.E. Velayudhan, A.K.P.A., Kozhikode

19.C.K. Natarajan, Colour Lab Association

20.Mani. P, Falcons Colour Lab

21.A. Sajithkhan, AE, KSEB

22.Joseph Antappan, Indsil Electromelts, Palakkad

23.H. Subramanian, National Laser Colour Lab

24.Udayan. M.K.

25.P.M. Jayarajan, Hotel Shanmugham

26.K. Rajendran, PVS Hospital

27.K.P. Radhakrishnan, Member, CGRF, Kozhikode

28.Sahadevan, All Kerala Photographers Association

29.T.V. Surendran, K.V.V.E.S.

30.Kumaran, Kadalundi

31.K.K. Raguchandran, K.V.V.E.S.

32.M. Divakaran, Kozhikode

33.Moideen Kutty. K.O., Kozhikode

34.Muhammed Unus. K, AE, KSEB

35.P. Byju, S.S, FTR Unit, Kozhikode

36.M. Venukumar, General Secretary, K.V.V.E.S. North

37.N.K. Rajendran, Chalapuram, Kozhikode

38.Chev. C.E. Chakko Varkey, President, All Kerala Consumer Goods

Distributors Associtiion.

## B. LIST OF PERSONS GIVEN WRITTEN OBJECTIONS

| Sl. No. | KSERC Dy. No. | Objections received from |
|---|---|---|
| 1 | 1163 | The Executive Director, M/s. Kanan Devan Hills Plantations Company Private Limited, KDHP House, Munnar – 685 612 |
| 2 | 1170 | Shri. C.P. Shajahan, Ramzy Manzil, Chavadimukku, Sreekariyam.P.O., Thiruvananthapuram 695 017 |
| 3 | 1185 | The President, Pathanamthitta Paurasamithi, Good Samaritan Hospital Building, Pathanamthitta 689 645 |
| 4 | 1201 | The Chief Executive Officer, Technopark, Technopark Campus, Thiruvananthapuram 695 581 |
| 5 | 1203 | The Senior Plant Manager, Indian Oil Corporation Limited, Indane Bottling Plant, Parippally, Kollam 691 574 |
| 6 | 1212 | The State President, M/s. Kerala Hotel & Restaurant Association, IInd Floor, K.H.R.A. Bhavan, M.G. Road, Kochi 682 035 |
| 7 | 1243 | Shri. P.K.M. Habeeb, Advocate, Manappat, Eriyad, Kodungallur 680666 |
| 8 | 1244 | The Executive Director, M/s. Kanan Devan Hills Plantations Company Private Limited, KDHP House, Munnar – 685 612 |
| 9 | 1247 | Shri. S. Krishnamoorthy, Manismrithi, T.C. 38/42, VNRA 59, Vivekananda Nagar, Thirumala, Thiruvananthapuram 695 006 |
| 10 | 1262 | Shri. M.V. Gopalakrishnan, Kalyani Nivas, Karivellur, Kannur 670521 |
| 11 | 1266 | The Managing Director, Tata Ceramics Limited, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 12 | 1268 | The Senior Vice President, CII Guardian International Limited, 16-B, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 13 | 1270 | The President & CEO, L.J. International Ltd., Plot No. 10 & 11, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |

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| 14 | 1272 | The President, Hotel & Restaurants Association, Maskoor Building, Court Road, Calicut – 673 001. |
| 15 | 1276 | The Dy. Development Commissioner, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 16 | 1277 | The Secretary, Cochin Special Economic Zone Industries Association, Ground Floor, CSEZ Admn. Bldgs. Kakkanad, Cochin – 682 037 |
| 17 | 1278 | M/s. K. Mohan & Company (Exports) Pvt. Ltd., Plot No. 30 & 31, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 18 | 1282 | The Director, Stable Magnet Wire (P) Ltd., Plot No. 4, Wing II (b), Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 19 | 1289 | The Director, SFO Technologies, RF & Wireless Division, Plot No. 2, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 20 | 1290 | The Director, SFO Technologies Digital Pvt. Ltd., Plot No. 36, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 21 | 1292 | The Director, SFO Technologies, Optronics Division, Plot No. 43, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 22 | 1293 | The Director, SFO Technologies, Cable & Wire Harness Division, Plot No. 17, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 23 | 1294 | The Director, SFO Technologies, Digital Division, Plot No. 37, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 24 | 1296 | M/s. Covema Filaments Limited, Plot No. 14-B, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 25 | 1297 | The Managing Director, Rubber Park India (P) Limited, 2A, Kautileeyam, Valayanchirangara, Ernakulam 683 556 |
| 26 | 1300 | The Director, MAK Games & Musical Equipments Pvt. Ltd., Plot No. 12-B, Cochin Special Economic Zone, Kakkanad, Kochi 682 037 |
| 27 | 1314 | The Managing Director, ARDL-INDIA Lab Pvt. Ltd., Plot No. 43A, B-Block, 3rd Floor, CSEZ, Kakkanad, Cochin 682 037 |
| 28 | 1320 | The Manager (Administration), AB Mauri India Pvt. Ltd., Plot No. 24, , CSEZ, Kakkanad, Cochin 682 037 |
| 29 | 1327 | Shri. Paul George, Shri. M.K. Simon, Shri. A.P. Joseph & Shri. Thomas |

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| | | Mathew, Ushus, NCC Gardens, NCC Road, Peroorkada, Trivandrum 5 |
| 30 | 1364 | The General Secretary, COMINCO Binani Zinc, Employees Union, Binanipuram P.O., Ernakulam 683 502 |
| 31 | 1365 | Shri. Jayapalan.C, Vilayil Veedu, NCC Road, Peroorkada.P.O., Trivandrum 5 |
| 32 | 1371 | Ms. Shahida Siddiq, Sreerag Video Lab, Pulliman Junction, Karunagappally, Kollam |
| 33 | 1372 | The General Secretary, Titanium General Labour Union (CITU), Thiruvananthapuram |
| 34 | 1375 | Shri. Krishnamoorthy, sk_moorthy@dataone.in |
| 35 | 1376 | The President, All Kerala Chemists & Druggists Association, Chemists Bhavan, P.B. No. 2458, Chavara Centre Road, Opp. South Railway Station, KOCHI 682 016 |
| 36 | 1379 | The General Secretary, Binani Zinc Employees Organization, Binanipuram P.O., Ernakulam 683 502 |
| 37 | 1380 | The District President, Solidarity Youth Movement, Islamic Centre, Palayam, Thiruvananthapuram 695 034 |
| 38 | 1381 | The Manager, Electrical Maintenance, MRF Limited, P.B. No. 2, Vadavathoor P.O., Kottayam 686 010 |
| 39 | 1382 | The Chief Engineer, Travancore Titanium Products Limited, P.B. No. 1, Thiruvananthapuram 695 021 |
| 40 | 1383 | The Managing Director, Kerala Co-operative Milk Marketing Federation Ltd., Milma Bhavan, Pattom Palace P.O., TVPM 4 |
| 41 | 1384 | The Joint Secretary, COMINCO Binani Zinc, Employees Association, Binanipuram P.O., Ernakulam 683 502 |
| 42 | 1388 | The Secretary, Chalakudy Puzha Samrakshana Samithi, Chaithanya, Moozhikkakadavu, Pariyaram 680 721 |
| 43 | 1389 | The Secretary, Edappally Senior Citizens' Forum, Changampuzha Park, Edappally, Kochi – 682 024 |
| 44 | 1425 | The State President, Kerala Hotal & Restaurant Association, II Floor, KHRA |

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| | | Bhavan, M.G. Road, KOCHI 682 035 |
| 45 | 1426 | The President, The Seafood Exporters Association of India, 'Seafood House', Willington Island, Kochi 682 003 |
| 46 | 1427 | The National Secretary General, Mahila Rashtriya Janata Dal, 13, Penta Estate, I Floor, Janatha, Palarivattom, Cochin 682 025 |
| 47 | 1428 | The General Secretary, Kerala Film Exhibitors Federation, 41/2253 A.I Cee Pee Building, Kalabhavan Road, Kochi 682 018 |
| 48 | 1429 | The State Secretary, INTUC, Kerala Branch, Congress House, Palace Road, Aluva |
| 49 | 1430 | The President, All India Centre of Trade Unions, Mass Hotel, Ernakulam |
| 50 | 1431 | The Convenor, Standing Council of Trade Unions, Ernakulam |
| 51 | 1432 | The President, Kerala Colour Lab Association, Challenger Color Lab, Karunagappally |
| 52 | 1433 | The Senior Manager – Electrical, Binani Zinc Limited, Binanipuram, Ernakulam 683 502 |
| 53 | 1434 | Shri. K.K. George, Consulting Engineer, 33, Giri Nagar, Cochin 682 020 |
| 54 | 1435 | The Kerala HT & EHT Industrial Electricity Consumers' Association, Productivity House, Jawaharlal Nehru Road, Kalamassery 683 104 |
| 55 | 1436 | The Manager (Electrical), Sree Sakthi Paper Mills Ltd., 'Sree Kailas', 57/2993-94, Paliam Road, Ernakulam 682 016 |
| 56 | 1437 | The President, Solidarity Youth Movement, Ernakulam Dist. Committee, Islamic Centre, Pulleppady, KOCHI |
| 57 | 1438 | Carbourundum Universal Thozhilaly Union, Kalamassery |
| 58 | 1439 | The President, Kairali Nagar Residents' Association, Kairali Nagar, Maradu, Cochin 682 304 |
| 59 | 1440 | The General Manager (Technical), The Travancore – Cochin Chemicals Ltd., Post Bag No. 4004, Udyogamandal .P.O., KOCHI 683 501 |
| 60 | 1441 | The Unit Manager, The Mathrubhumi Printing & Publishing Co. Ltd., P.B. No. 1851, Kaloor, KOCHI 682 017 |

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| 61 | 1442 | The General Secretary, INDAL Workers Association, Alupuram, Alwaye 683 504 |
| 62 | 1443 | The Secretary, Residents' Apex Council - Ernakulam, Krishna Nivas, Adv. Easwara Iyer Road, KOCHI 682 035 |
| 63 | 1444 | The Member, Executive Committee, The Kerala State 'A'Grade Electrical Contractors' Association |
| 64 | 1445 | The Dist. Secretary, BMS, Ernakulam Dist. Committee, I.S. Press Road, Kochi 682 018 |
| 65 | 1447 | The General Secretary, The Travancore-Cochin Chemicals Employees Association, Eloor, Udyogamandal – 683 501 |
| 66 | 1448 | The General Secretary, Aluminimum Factory Worker's Union (C.I.T.U.), Alupuram P.O., Kalamassery, Ernakulam 683 504 |
| 67 | 1449 | The Secretary, Kerala Cine Exhibitors Association, 2nd Floor, Film Chamber Building, M.G. Road, COCHIN 35 |
| 68 | 1450 | HOCL Joint Forum of Trade Unions, Ambalamugal, KOCHI 682 302 |
| 69 | 1451 | The Convener, Save FACT Action Committee, S.C.S. Menon Memorial Building, Eloor, Udyogamandal. P.O., Ernakulam 683 501 |
| 70 | 1452 | The General Secretaries, Forum of FACT Employees Unions, Kalamassery, Ernakulam |
| 71 | 1453 | Shri. C.P. Paul, South Area Development Forum, Shalimar Tourist Home, Ernakulam South |
| 72 | 1454 | Shri. P.A. Sudheeran, Kerala Electrical & Allied Engg. Co. Ltd., Mamala.P.O., KOCHI |
| 73 | 1455 | The Chief Engineer (Electrical), The Fertilisers and Chemicals Travancore Ltd., Udyogamandal, KOCHI 683 501 |
| 74 | 1456 | The Dy. Chief Engineer (Ele), I/c, Office of the Dy. CE, Cochin Port Trust, W. Island, COCHIN 682 003 |
| 75 | 1457 | The Asst. Secretary, Electricity Department, Trichur Corporation, Trichur |
| 76 | 1458 | M/s. Balus Polymers, KINFRA Park, Nellad.P.O., Muvattupuzha, Ernakulam |

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| 77 | 1411 | The Divisional Railway Manager (Electrical), Divisional Headquarters, Thycaud, Thiruvananthapuram 695 014 |
| 78 | 1413 | Shri. T.C. Narayanan, ‘Reha’, 1/4150 D Telecom Quarters Road, East Hill, PO West Hill, Calicut 673 005 |
| 79 | 1423 | Shri. T.P. Sadananda Pai, Member, SEEM Mobile No. 94474 59601 |
| 80 | 1472 | The Dy. General Manager (M), ITI Limited, Palakkad Plant, Kanjikode West, Palakkad – 678 623 |
| 81 | 1475 | Shri. K.P. Sukumar, 50/304 A, ‘Pankaj’, Prasanthi Nagar, Edappally.P.O., KOCHI 682 024 |
| 82 | 1478 | The Chief Executive Officer, Infopark, Thapasya, Kusumagiri.P.O., Kakkanad, Kochi 682 030 |
| 83 | 1481 | The Director, M/s. Abad Exports Pvt. Ltd., 7/455, Bay Pride Buildings, Jew Town Road, Cochin - 2 |
| 84 | 1482 | The Managing Partner, M/s. Geo Seafoods, Post Box: 906, Palluruthy, COCHIN 682 006 |
| 85 | 1483 | The Director, M/s. Bhatsons Aquatic Products, C.C. XVI/1564, Bhat Memorial Building, Thoppumpady, Cochin 682 005 |
| 86 | 1484 | The Vice President, M/s. Accelerated Freeze Drying Company Ltd., EZHUPUNNA 688 548 |
| 87 | 1486 | The Managing Director, KINFRA, Kinfra House, 31/2312, Sasthamangalam, Trivandrum |
| 88 | 1487 | The Managing Director, Kinfra Export Promotion Industrial Parks Ltd., IX/159 A, Kusumagiri.P.O., Kakkanad, COCHIN 30 |
| 89 | 1502 | The President, All Kerala Consumer Goods Distributors’ Association, 3$^{rd}$ Floor, Kevin Arcade, Kevin Bazar, M.P. Road, Calicut 673 001 |
| 90 | 1503 | The Managing Director, The Western India Plywoods Ltd., Baliapatam, Cannanore |
| 91 | 1504 | Shri. Divakaran, House No. 29/952, Kuthiravattom.P.O., Kozhikode 673 016 |
| 92 | 1505 | Shri. M. Bhaskaran, Mayor, Kozhikode Corporation 673 032 |

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| 93 | 1506 | Shri. Jose. T.V., Thamarasseril House, Mayanad.P.O., Medical College, Kozhikode 8 |
| 94 | 1507 | The Secretary, Thiruvananthapuram Development Protection Council, Shree Dhaniya, Dr. Palpu Memorial Building, Pettah, TVM |
| 95 | 1508 | The Secretary, Periyar Hermitage Owners' Association, Thaikkattukara.P.O., Aluva 683 106 |
| 96 | 1509 | The Chief Engineer – Electrical, Hindustan Organic Chemicals Limited, Ambalamugal, Ernakulam 682 302 |
| 97 | 1510 | The President, Hotel & Restaurant Association, Maskoor Building, Court Road, Calicut 673 001 |
| 98 | 1494 | The Co-ordinator, Kerala Catholic Engineering College Managements' Association, Rajagiri School of Engineering & Technology, Rajagiri Valley. P.O., KOCHI 682 039 |
| 99 | 1496 | The Secretary, Thrissur Corporation, THRISSUR |
| 100 | 1569 | The Dy C.E. (Ele.) i/c. Office of the Dy. CE (Ele.), Cochin Port Trust, W. Island, COCHIN 3 |
| 101 | 1592 | The President, All Kerala Photographers Association, Kozhikode Dist. Committee, Near Old Post Office, Nutstreet, Vatakara 4 |
| 102 | 1593 | The President, Kerala Samsthana Upabokthru Samrakshana Vedi, Sreekrishna Building, Kozhikode 673 001 |
| 103 | 1579 | The Executive Director, Kanan Devan Hills Plantations Company Pvt. Ltd., KDHP House, Munnar |
| 104 | 1600 | The President, Kerala Colour Lab Association, Challenger Color Lab, Karunagappally |
| 105 | 1601 | The Kerala State Small Industries Association, X/26A, HMT Ancillary Industrial Estate, HMT Colony .P.O., Kalamassery – 683 503 |