

BEFORE THE HARYANA ELECTRICITY REGULATORY COMMISSION

REVIEW PETITION NO. OF 2016

IN THE MATTER OF:

Petition under section 94 of the Electricity Act 2003 and Regulation 78 (1) & (2) of Haryana Electricity Regulatory Commission (Conduct of Business) Regulations, 2004 alongwith its subsequent amendments for review of Haryana Electricity Regulatory Commission Tariff Order dated 01.08.2016 for ***True-Up for FY 2014-15, Annual (mid-year) Performance Review for FY 2015-16, Revised Aggregate Revenue Requirement of UHBVNL and DHBVNL and Distribution & Retail Supply Tariff for FY 2016-17***

AND

IN THE MATTER OF:

Uttar Haryana Bijli Vitran Petitioners Limited (UHBVNL) & Dakshin Haryana Bijli Vitran Petitioners Limited (DHBVNL) - Petitioners

MOST RESPECTFULLY SHOWETH:

1. BACKGROUND

The Haryana Electricity Regulatory Commission (HERC) or the Hon'ble Commission, in exercise of its powers vested under the Electricity Act, 2003 (EA 2003 or Electricity Act) passed Impugned tariff order for ***True- Up for FY 2014-15, Annual (Mid-Year) Performance Review for FY 2015-16, Revised Aggregate Revenue Requirement of UHBVNL And DHBVNL And Distribution & Retail Supply Tariff for FY 2016-17, Dated, 1st August, 2016.***

1.1 The Hon'ble Commission has stated to have undertaken the following in the Impugned tariff order.

- (a) *Truing up exercise for FY 2014-15;*
- (b) *Annual (mid-year) Performance Review for the FY 2015-16;*
and
- (c) *Determination of ARR for FY 2016-17, under MYT Regulations, notified by Hon'ble Commission vide dated 05th Dec. 2012.*

1.2 The petitioners requests the Hon'ble Commission to revisit over certain aspects of the Impugned tariff order, dated 1st August 2016 and would request the Hon'ble Commission to review and consider

the same. The issues which the petitioners would like to take up in this petition are detailed in the following sections.

2. ISSUES FOR REVIEW

a) Losses Approved By Ministry of Power for FY 2014-15

It is hereby submitted that Ministry of Power had notified revised AT&C loss trajectory considering Jind Circle in UHBVN vide letter dated 11th August 2014. The Discoms in the ARR petition for FY 2015-16 had projected transmission and distribution loss for FY 2014-15 and FY 2015-16 as 28.58% and 24.79% respectively based on notified AT&C losses of 31.29% and 27.88% for FY 2014-15 and FY 2015-16 respectively. Moreover, the Hon'ble Commission in its tariff order dated 07.05.2015 admitted T&D losses assessed considering AT&C loss trajectory notified by the MoP.

The Discoms in the petition for True-Up of FY 2014-15 have considered T&D loss based on AT&C loss trajectory approved by MoP i.e. 28.58% for UHBVN and 24.48% for DHBVN. However, in its impugned tariff order the Hon'ble Commission has considered T&D losses approved in MYT order dated 29.05.2014 which are lower than the Losses approved by Ministry of Power.

The Truing Up of Power Purchase cost of FY 2014-15 based on Losses approved in MYT order dated 29.05.2014 instead of Losses approved by MoP and admitted by Hon'ble Commission in Tariff order dated 07.05.2015 has resulted in disallowance of power Purchase cost and consequently understating of Annual Revenue Requirement of FY 2014-15. Hence, the Hon'ble Commission is requested to consider T&D loss based on the AT&C loss trajectory approved by MoP for FY 2014-15 and accordingly approve power purchase cost of FY 2014-15 based on T&D loss of 28.58% for UHBVN and 24.48% for DHBVN.

b) Power Purchase Cost of FY 2014-15.

It is hereby submitted that as per MYT Regulation, 2012, variation on account of uncontrollable items shall be treated as a pass-through. The Hon'ble Commission while Truing-Up the Annual Revenue Requirement of FY 2014-15 in its order dated 01.08.2016 admitted actual power purchase cost of Rs 21825 Cr.

However, Rs 363 Cr has not been considered while truing up of power purchase cost of FY 2014-15 as the total actual power

purchase cost as per the audited account of UHBVN and DHBVN is Rs 22187.75 Cr.

It is also submitted that Hon'ble APTEL in Appeal No. 255 OF 2014 in the matter of Damodar Valley corporation versus Jharkhand State Electricity Regulatory Commission, regarding disallowance of Power purchase cost while truing up of Annual revenue Requirement of FY 2013-14 has directed the state commission to allow the Power purchase cost as per the audited account of FY 2013-14. The relevant extract of the order has been reiterated below:

“As regards the power purchase cost is concerned, the State Commission is hereby directed to re-determine the same keeping in view the fixed charges of the power purchase cost as approved by the Central Commission and incurred by the Appellant duly audited, should be reconsidered subject to the prudent check as advised above. Hence the present Appeal filed by the Appellant has been allowed partly on the only issue regarding the consideration of power purchase cost.”

Hence, it is submitted that as per power purchase cost is uncontrollable factor, the Hon'ble Commission should allow Power Purchase cost to the Discoms considering the actual audited figures for FY 2014-15.

c) Fuel Surcharge Adjustment pertaining to FY 2014-15

The Hon'ble Commission in the impugned tariff order dated 01.08.2016 has allowed Rs. 1182.43 Cr considering losses approved by the Hon'ble Commission in its tariff order of FY 2014-15 instead of losses approved by MoP. In addition, the Hon'ble Commission has not considered Rs 363 Cr in the Power purchase cost which has led to lower per unit average power purchase cost, thereby, reducing the FSA of FY 2014-15.

d) Interest Cost of fresh Borrowing of FRP for FY 2014-15

As per the FRP scheme, banks will fund the operational deficit of the Discoms to the extent of 100% in FY 2012-13, 75% in FY 2013-14 and 50% in FY 2014-15. Therefore, to bridge the operating losses of the Discoms, fresh funding of loans was allowed under the FRP scheme which was approved in principle by the Hon'ble Commission. Interest on such loans has also not been considered in its impugned tariff order for FY 2014-15.

Therefore it is requested before the Hon'ble Commission to allow interest on fresh funding otherwise the utilities will again land up in a Debt Trap and the prime prerogative of rolling out of the FRP will be negated.

e) Fixed Cost of Power Purchase of FY 2014-15.

It is submitted that the Discoms have done PPA based on long term projections and all the PPA done by the Discoms have been approved by the Hon'ble Commission. The Hon'ble Commission in its impugned tariff order dated 01.08.2016 has approved average power purchase cost i.e. Rs 3.94 per unit which includes per unit fixed cost of power purchase. Further, the Hon'ble Commission has calculated disallowed cost of power purchase on the basis of average per unit cost of power purchase i.e. Rs 3.94 per unit and Disallowed units.

It is pertinent to mention that fixed cost of power purchase is not function of Transmission and Distribution Losses and any reduction in Transmission and Distribution Losses would result in reduction of total variable cost borne by the Discoms and not the fixed cost as fixed charges are paid by the utility to the generators irrespective of any losses or quantum of units purchased. Therefore, the disallowed power purchase cost should be based only on variable cost of power purchase and disallowed unit.

Hence, it is prayed before the Hon'ble Commission that the disallowed power purchase cost should be based only on variable cost of power purchase and disallowed unit. Hence, the same should not be included while computing cost of disallowed units of power due to higher losses.

f) Sharing of Gain and Losses under Incentive and Penalty framework:

It is hereby submitted that section 12 of Haryana Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff for Generation, Transmission, Wheeling and Distribution & Retail Supply under Multi Year Tariff Framework) Regulations, 2012 deal specifically in sharing of Gain and Losses under Incentive and Penalty Framework. As per section 12.4 of the aforementioned regulations, any gain on account of controllable parameter has to be shared between the Discom and the beneficiaries in the ratio of 50:50. The Relevant extract of the aforementioned regulation has been given below:

“In case of gain

The item wise gain shall be shared between the generating company or the licensee, as the case may be, and their respective beneficiaries in the ratio of 50:50. However, the sharing ratio of 50:50 may be revised to a maximum of 60:40 at the time of true-up during mid-year performance review / true-up. The manner of utilization of the additional 10% gain shall be specified by the Commission from time to time.

12.5 In case of loss

12.5.1 The item wise losses on account of controllable factors in case of a distribution licensee shall be dealt with in the following manner:

(a) The loss to the Distribution Licensee on account of Distribution losses, as may be admitted by the Commission after prudence check, shall be dealt with as under:

(i) One-third of the amount of such loss may be passed on as an additional charge in tariff over such period as may be specified in the Order of the Commission; and

(ii) The balance amount of loss shall be absorbed by the Distribution Licensee.”

The Hon'ble Commission has approved Rs 115.53 Cr as R&M Expense for FY 2014-15 in the tariff order dated 29.05.2014. As per the Audited Accounts of FY 2014-15, the R&M Expense are Rs 55.69 Cr which is lower than the approved R&M expense by Rs 59.84 Cr. Accordingly as per section 12.4 of MYT Regulations, 2012, the gain on account of this should be shared between Discom and Beneficiary in the ratio of 50:50 hence Rs. 29.92 Cr should be allowed additionally to the Discoms.

Moreover, in case of loss due to distribution losses, the loss has to be shared between the license and the consumers in the ration of 1:3. The relevant extract of the regulation has been given herewith:

“12.5 In case of loss

12.5.1 The item wise losses on account of controllable factors in case of a distribution licensee shall be dealt with in the following manner:

(a) The loss to the Distribution Licensee on account of Distribution losses, as may be admitted by the Commission after prudence check, shall be dealt with as under:

(i) One-third of the amount of such loss may be passed on as an additional charge in tariff over such period as may be specified in the Order of the Commission; and

(ii) The balance amount of loss shall be absorbed by the Distribution Licensee.

(b) The item wise losses on account of other controllable factors, unless otherwise specifically provided by the Commission, shall be borne by the distribution licensee.”

It is again submitted that the Hon’ble Commission in the ibid order has considered T&D losses approved in the tariff order dated 29.05.2014 i.e. 25.00% for UHBVN and 19.01% for DHBVN for truing up the power purchase cost of FY 2014-15. In the impugned Tariff order dated 01.08.2016 has Hon’ble Commission has disallowed the power purchase cost of Rs 1500.85 Cr.

MoP has approved the AT&C losses for UHBVN and DHBVN i.e. 28.58% for UHBVN and 24.48% for DHBVN. Based on MoP approved losses, the Discoms have projected revised Power purchase cost to be Rs18371.65 Cr, disallowing Rs 524.36 Cr. Accordingly as per section 12.5 of MYT Regulations, 2012, the loss on account of this should be shared between Discom and Beneficiary in the ratio of 1:3. Hence, Rs. 174.79 Cr on this account should be allowed additionally to the Discoms given that the losses approved by Ministry of Power are considered by the Hon’ble Commission. However. If the loss approved vide the aforementioned order dated 29.05.2014 are considered by the Hon’ble Commission, the Rs 500 Cr must be allowed to the Discoms as per the Section 12.5 of the MYT regulations, 2012.

g) Fixed Cost of Power Purchase of FY 2016-17

The Hon’ble Commission in the impugned order has allowed Rs 4980.3 Cr as fixed cost of power purchase for FY 2016-17. However, as per the provisional accounts of FY 2015-16, the actual fixed cost of power purchase borne by the Discoms is Rs 6527.74 Cr.

It is pertinent to mention that Hon’ble CERC in Tariff Regulations, 2014 has notified escalation rate for O&M cost i.e. 6.64% per annum. The estimated fixed cost of power purchase escalated at this rate would be equal to **Rs 6961.18 Cr** and in no case can be lower than the actual fixed cost borne by the Discoms in FY 2015-16. Considering the above, it is observed that the fixed cost of

power purchase borne by the Discoms as a legal obligation due to PPA being done with the generators and approved by the Hon'ble Commission. The Hon'ble Commission is therefore requested to allow the fixed cost of Power Purchase of FY 2016-17 based on the actual fixed cost of power purchase of FY 2015-16 as understating of the power purchase cost has direct effect of Annual Revenue requirement of the Discom.

h) Administration and General Expense of the FY 2016-17

The Hon'ble Commission in the impugned tariff order has allowed Rs 78.49 Cr as Administration and General Expense for FY 2016-17. The Hon'ble Commission has calculated A&G expense of FY 2016-17 by escalating A&G expense by escalation factor of 2.47%.

However, the Hon'ble Commission has inadvertently escalated A&G cost of FY 2014-15 only once. Whereas, the same should have been escalated two times to arrive at A&G expense for FY 2016-17. Accordingly the A&G expenses should have been Rs 80.43 Crore.

Hence, the Hon'ble Commission is requested to pass a suitable order and revise A&G expenses for FY 2016-17 to Rs. 80.43 Crore.

i) Interest on working capital of FY 2016-17.

The Hon'ble Commission in its impugned tariff order dated 01.08.2016 for FY 2016-17 has not considered the Interest on working capital of Rs. 1436.50 Crore on account of financial implication of UDAY scheme.

The purpose of providing interest on working capital is to service the cash flow necessary for the Petitioner to conduct its business activities namely to take care of the time period between incurring of the cash expenditure by the Nigam and the realization of the revenue by the Nigam.

With regards to interest on working capital the Hon'ble Commission in its impugned Order has ruled that it shall consider the same at time of True-up for the FY 2016-17 after taking into consideration of the implementation of other terms & conditions of UDAY Scheme. However, as pointed above the working capital is necessary for any business to smoothly manage its day to day activities. By not allowing the interest on working capital the Hon'ble Commission has denied the Petitioner of the rightful amount of interest that should have been included in the ARR to

give more accurate picture of the expenditures to be incurred by the Petitioner.

The Discoms have projected the interest on working loan based on the opening loan balance of FY 2016-17. Therefore, the projected interest cost is an inevitable cost and disallowance of interest on working capital i.e. Rs 1436.50 Cr based on actual loans admitted under UDAY scheme has an impact on its cost of supply and in turn on AP-Subsidy, this will have an impact on the cash flow of the Petitioner and the prime prerogative of rolling out of the UDAY scheme will be negated.

Moreover, Truing-up is a process to allow actual expenditure on the basis of actual audited accounts based on prudence check. However, not considering the expenses while approving the ARR simply because the same can be trued up at later stage is against the principle of natural justice. If this principle as adopted by the Hon'ble Commission is considered than the entire process of projecting and approval of ARR will lose its significance since at the end every expense/ revenue is to be Trued-up and going by this principle there may be no need to make any projections at all and if the same is not considered during the ARR approval and considered only at the time of true-up the difference between the approved and actual may be vast which may then lead to accumulation of huge gaps to be recovered from the consumers thus giving them tariff shock.

In view of above, it is requested that the Hon'ble Commission may please consider the submissions made by the Petitioner in this regards and accordingly, allow Interest on working capital at Rs. 1436.50 Crore on account of financial implication of UDAY scheme

j) Disallowance of Return on Equity

The petitioners would like to submit that in its impugned tariff order, the Hon'ble Commission has not allowed even a minimum percentage of return on equity to the appellants on each year, as per the norms set by MYT Regulations, notified by the Hon'ble Commission dated 05.12.2012, with a maximum limit 14% yearly.

The relevant extracts from MYT Regulations, in the concerned matter are as follows:

"20. RETURN ON EQUITY

20.1 The rate of return on equity shall be decided by the Commission keeping in view the incentives and penalties and on the basis of overall performance subject to a ceiling of 14% provided that the ROE shall not be less than the net amount of incentive and penalty .

20.2 Return on equity shall be allowed on equity employed in assets in use considering the following and subject to regulation 20.1 above:

i. Equity employed in accordance with regulation 19.1 and 19.2 on assets (in use) commissioned prior to the beginning of the year; plus

II. 50% of equity capital portion of the allowable capital cost for the assets put to use during the year.

Provided that for the purpose of truing up, return on equity shall be allowed from the COD on pro-rata basis based on documentary evidence provided for the assets put to commercial operation during the year.

20.3 Return on equity invested in work in progress shall be allowed from the actual date of commercial operation of the assets.

20.4 There shall be no Return on Equity for the equity component above 30%”.

It is a known fact that RoE is very vital source of funding a portion of Capital Expenditure planned by the Utilities in order to improve the system and to achieve further loss reduction. Disallowing RoE on the context of financial performance deprives the utilities of an indispensable source of internal accrual which is more significant in view of the financially constrained position that creates a very difficult situation while endeavoring to borrow funds from the market to fund basic capital expenditure.

Moreover this is significant from the fact that the framing of FRP and notifying the same after approval of the state cabinet for the forthcoming period including the MYT control period envisages recapitalization resulting in recouping of negative net worth over the turnaround period. Not allowing ROE would further delay the turnaround as envisaged under FRP scheme for the power Discoms of Haryana. Thus in order to ensure the efficient development as well as financial viability of DISCOM, the Hon'ble Commission

must allow at least a minimum percentage of return on equity to the distribution companies.

k) AP Subsidy for FY 2016-17

The Hon'ble Commission in its impugned order of FY 2016-17 has allowed AP subsidy of Rs 6434.57 Cr against Rs 6800 Cr budgeted by Govt. of Haryana. The Hon'ble Commission in the impugned order has not considered 1436.50 Crore of interest cost on working capital. The Hon'ble Commission has also assumed AP consumption of FY 2015-16 equivalent to AP consumption of FY 2014-15 and thereafter the estimated AP sales has been escalated at a rate of 5% thereby underplaying the AP consumption. Moreover, the Hon'ble Commission has also understated Power purchase cost of FY 2016-17 thereby reducing the average cost of supply. The cumulative effect of the above has resulted in reduced average cost of supply which in turn has led to reduction in AP Subsidy for FY 2016-17.

l) Disallowance of Power Purchase from Pragati Power.

It is hereby submitted that the 1371 MW Combined Cycle Pragati Power Station is a Mega Power Project of Govt. of Delhi; the beneficiaries of the project are Delhi, Haryana and Punjab. Earlier Govt. of Delhi in order to ensure embedded green power conceived a Combined Cycle power plant at outskirts of Delhi. In the beginning, the plant was proposed to be installed to meet out growing need of Delhi state only. However, on the request of the then Hon'ble Chief Minister, Haryana vide D.O.CMH-2007/ISB-3401 dated 07th June 2007, then Chief Minister of Delhi consented to allocate 10% share each for Haryana and Punjab on long-term basis.

Accordingly, based upon firm and long-term requirement of power to Haryana, Punjab and Delhi states the power plant was conceived and financing was done by Power Finance Corporation considering its long-term arrangement of sale of power. Moreover, due to long-term allocation to States of Haryana and Punjab from the station by GNCTD, the overall capacity of the plant was increased. The increased plant capacity resulted in failing the project under Mega Project category. The project was granted mega project status by the Govt. of India which resulted in substantial savings in Custom Duties hence reduced cost of the project. The

reduced cost of the project resulted in lowest capacity charges in its category.

However, due to non-availability of cheaper domestic gas for full capacity generation from the plant the balance gas is being arranged as spot R-LNG which results in increased energy charges and overall tariff of the station.

The Hon'ble Commission vide its suo-motu petition for the PPAs not stand approved by the commission under section 86(1)(b) of the Electricity Act in case no HERC/PRO-36 of 2015 HPPC in respect of Pragati power had submitted as under:

“ 7(c) with respect to Pragati Gas Power Station (hereinafter referred to as “Pragati GPS” for the sake of brevity), it was submitted that the power purchase agreement dated 23.06.2009 has been already submitted to the commission for approval vide Memo No Ch-60/HPPC/SE/C&R/PPA-6/Vol-1 dated 15.09.2014, in response to the directions from this Commission given vide order dated 21.07.2014 in HERC/Pro-12 of 2014 (Suo-motu). Haryana is having share of 137.1MW in this project.”

Hon'ble Commission vide its order dated 31.03.2016 had directed as under:

“1. (d) Regarding Power Purchase Agreement with Pragati Gas Power, the Commission observes that PPA for this project has never been submitted for approval of the Commission at any time before the matter was taken up by the Commission vide the present Suo-motu proceedings and the PPA has been submitted for approval to the Commission only now after the commencement of present Suo-motu proceedings. It has been informed by HPPC that as the availability is declared by this project with RLNG, which is costlier, the power from this project is sparingly scheduled and most of the time during the peak load hours only. It has further being submitted that the proposal has already been sent to Gov. of Delhi for surrendering power from this project for at least 2 years and the decision of the Gov. of Delhi is still awaited.

Commission observes that this proposal of surrendering power from this project for next two years need to be pursued vigorously by HPPC and they should inform the Commission about the final outcome in the matter within three months of this

order. The Commission will take the final view regarding the approval of PPA of this project, thereafter.”

It is to be submitted that Pragati Power is having ISGS station (Inter State Generating Station with more than one beneficiaries State as producer) owned by Gov. of Delhi and the share of 10% was allocated on the request of Govt of Haryana.

The long-term PPA signed between HPCC and PPCL has no provision of pre-mature termination of contract and exit clause. Similar is the case for all power plants of Central and State Sectors which has been installed and financed with long-term PPAs. The allocation of power from PPS- III Bawana is also on long-term basis to Govt. of Haryana by the Govt. of Delhi.

However, Haryana has already raised the issue for surrendering of power and allocation to the needy state through DO letter by ACS/Power vide dated 02.11.2015 & MD/UHBVN dated 20.10.2015, but PPCL had clearly intimated that PPA don't have such clause for early termination and same cannot be accepted.

Keeping in view the contractual obligations, Haryana, is bound to pay the fixed charges and schedule the energy on merit as per the demand scenario. But as per the impugned order dated 01.08.2016 the Hon'ble Commission has not approved source of the project and doesn't allow any charges to be paid by HPPC to the Generator. This means in case HPPC pay the fixed charges to Pragati Power, the same cannot be loaded to the consumers which is not justified. Therefore, it is requested to allow Pragati Power as source of power purchase.

m) Scheduling of Power from Lanco Amarkantak

It is hereby submitted that HPPC entered into Power Purchase Agreement with Lanco Amarkantak through PTC on 21.09.2006 for sale of 300MW of power. The Hon'ble Commission accorded approval on 06.02.2008. Lanco Amarkantak raised the issue of force majeure and also intimated the implementation agreement to be entered with Chhattisgarh state. Lanco Amarkantak entered into PPA with Chhattisgarh state for supply of 35% of power from the project.

The Hon'ble Commission in tariff order dated 01.08.2016 has approved 785.77 MU as power to be scheduled from the generator during the FY 2016-17. The Hon'ble Commission has considered the Haryana share as 65% of the total capacity. However, the order

passed by the Hon'ble APTEL of recognizing 35% power to Chhattisgarh based on the implementation agreement dated 01.08.2010 was in context utilities demanding the entire 100% of Unit-II in pursuance of the power purchase agreement and power sales agreement entered between Lanco and PTC and PTC and Haryana Utilities. The Stand of Haryana utilities was that it should get 100% of the power under the Implementation Accordingly, the Haryana Utilities should be allowed 95% of the power of the available capacity from Lanco Project Unit No 2 for being supplied to the Haryana Utilities on the same terms and conditions as applicable to the 65% of the Power as per the various order of Hon'ble APTEL and the Hon'ble Supreme Court of India dated 19.05.2015 giving Lanco the coal linkages from SECL, the transmission capacity from Power grid etc. Lanco is obliged to supply to Haryana Utilities 95% power upon Chhattisgarh not taking 30% out of 35% power allocated to it as per the above order of the Hon'ble APTEL.

Further, it is not open to Lanco Amarkantak to claim any part of its power from Unit No-2 can to sold to third party except to the extent Chhattisgarh was claiming under the implementation agreement.

In View of above, it is evident that Haryana Discoms are bound to off-take 95% of contracted capacity of Generation from M/s Lanco Amarkantak project, else HPPC is bound to pay the deemed availability charges. Therefore, it is requested before the Hon'ble Commission to allow offtake of 100% of power of unit-II to Haryana utilities.

In view of above, it is requested that the Hon'ble Commission may please consider deficiencies of the impugned tariff order and additional liabilities arising out of Hon'ble APTEL judgements on CoD, Changes in Law etc. and allow the Nigam to continue the FSA determined vide order dated 19.03.2015.

3. Prayer

3.1 In view of the aforesaid mentioned facts, the petitioners most respectfully prays the Hon'ble Commission to :

(a) *Review and modify the Tariff Order for True-up for the FY 2014-15, Annual (mid-year) Performance Review for the FY 2015-16 and revised Aggregate Revenue Requirement of UHBVNL & DHBVNL & distribution & retail supply tariff for*

the FY 2016-17, dated, 01st August 2016 to the extent of the submissions made by the petitioner in the present review petition.

- (b) Condone any inadvertent omissions/errors/shortcomings and permit the appellants (UHBVN & DHBVN) to add/change/modify/alter this filing and make further submissions as may be required at a future date.*
- (c) To condone any delay in filing the petition due to reasons unavoidable by the Discoms.*
- (d) To pass necessary order regarding.*

For and on behalf of Petitioner

Place: Panchkula

Date: 19.10.2016