

## **HIMACHAL PRADESH ELECTRICITY REGULATORY COMMISSION, SHIMLA**

In the matter of formulation of the Himachal Pradesh Electricity Regulatory Commission (Short Term Open Access) (First Amendment) Regulations, 2018.

**CORAM**  
**Sh. S.K.B.S. Negi**  
**Chairman**  
**Sh. Bhanu Pratap Singh**  
**Member**

### **ORDER**

The Himachal Pradesh Electricity Regulatory Commission (hereinafter referred as “the Commission”), after prior publication, notified the Himachal Pradesh Electricity Regulatory Commission (Short Term Open Access) Regulations, 2010, on 2<sup>nd</sup> June, 2010;

2. The distribution licensee i.e. Himachal Pradesh State Electricity Board Limited (HPSEBL) in petition No. 28/2017 related to determination of Additional Surcharge for Short Term Open Access consumers for FY 2017-18 has submitted that the Commission may consider mandate to schedule power for at least 24 hours, by short term open access consumers, whenever they seek Open Access. The HPSEBL has referred the consultation paper of Ministry of Power, GoI pertaining to Open Access, wherein it has been proposed that Open Access consumers should be required to schedule power for at least 24 hours whenever they seek Open Access to avoid frequent switching by Open Access consumers.
3. The HPSEBL vide letter dated 29.11.2017 and 08.01.2018 has requested the Commission to consider their proposal to make provision for scheduling of power for at least 24 hours to seek the Open Access to prevent frequent switching alongwith other issues likely to arise due to change in load.
4. The working group constituted by the Forum of Regulators (FoR) on the issues related to Open Access has also recommended that measures like scheduling of power for certain slot of time i.e. for at least 24 hours, may be strictly followed, to prevent frequent switching and the same is endorsed by the FoR in its 62<sup>nd</sup> meeting held on 15<sup>th</sup> December, 2017. This has necessitated the amendment of Regulation 23 of the Himachal Pradesh Electricity Regulatory Commission (Short Term Open Access) Regulations, 2010.

5. Taking into consideration the above, the Commission notified the draft amendment i.e. HPERC (Short Term Open Access) (First Amendment) Regulations, 2018 on 14<sup>th</sup> March, 2018 and published the same in Rajpatra, Himachal Pradesh on 20<sup>th</sup> March, 2018 in exercise of the power conferred under sub-section (1) of section 181 of the Electricity Act, 2003 (36 of 2003);
6. As required vide sub-section (3) of the section 181 of the Act, the Commission invited public objections and suggestions by way of insertions in two News papers i.e. “The Tribune” and “Daink Bhasker” on 24<sup>th</sup> March, 2018 under Rule (3) of Electricity (Procedure of Previous Publication) Rules, 2005 and the full text of the draft amendment regulations was made available on the Commission’s website: [www.hperc.org](http://www.hperc.org).
7. The Commission, vide letter dated 05.05.2018, requested the major stakeholders, including State Government, Directorate of Energy, Distribution Licensee, SLDC and STU to send their objections/suggestions as per the aforesaid public notice.
8. The following stakeholders have submitted their objections/suggestions on the aforesaid amendment:-
  - (i) M/s Ambuja Cements Ltd., P.O. Darlaghat Tehsil; Arki, Distt. Solan and; Vill.: Navagraon, P.O. Jajhra, Tehsil: Nalagarh, Distt.:Solan – 174101 (H.P).
  - (ii) M/s Birla Textile Mills, Sai Road, Bhatouli Khurd, PO Baddi, Distt Solan 173205.
  - (iii) Open Access Users Association, 2<sup>nd</sup> Floor, D21, Corporate Park, Sector-21, Dwarka, New Delhi- 110075.
  - (iv) M/s ACC Limited, Gagal Cement Works, PO Barmana, Bilaspur -174013 (HP).
  - (v) Indian Energy Exchange Limited, Unit No. 3,4,5 & 6, 4<sup>th</sup> Floor, TDI Centre, Plot No.7, Jasola District Centre, New Delhi – 110025.
  - (vi) The B.B.N. Industries Association, EPIP- Jharmajri Road, EPIP Phase 1, Jharmajri- Baddi, Distt. Solan- 174103 (HP).
  - (vii) M/s Inox Air Products Limited, Vill. Kunjhal Barotiwala Industrial Area, Nalagarh, Distt. Solan (HP).
  - (viii) Directorate of Energy, Shanti Bhawan, Phase-III, Sector-6, New Shimla- 171009.

9. The public hearing in the matter was held on 19<sup>th</sup> May, 2018, the list of participants who attended the public hearing is annexed as Annexure-“A”.
10. Apart from written submissions the participants/representatives in public hearing have also expressed their view points as under:-
- a. The representative of Indian Energy Exchange Limited stated that neither Ministry of Power (MoP) consultation paper nor the Forum of Regulators (FoR) report give any evidence or data as what losses Discoms are incurring which are not being compensated by statutory provisions of cross subsidy surcharge and additional surcharge.  
He further stated that Open Access (OA) consumers are already being intimated in advance i.e. one day ahead of their power procurement planning. Moreover, in the State of Himachal Pradesh, the open access in distribution is only 2% of the total consumption of Discom and it is easily manageable as far as power procurement planning of Discom is concerned. He further stressed that the proposed amendment may not hold good for competition in the power sector.
  - b. The representatives of M/s INOX Air Products Limited and M/s ACC Limited stated that their written submissions may be considered while finalising the proposed amendment.
  - c. The representative of HP Power Transmission Corporation (STU) stated that it should be mandatory to schedule power for at least 24 hours by short term open access consumers for effective grid discipline and may also help Discom in effective power procurement planning.
  - d. The representative of HPSLDC stated that the deviation by short term open access consumers with reference to their declared schedule versus power actually purchased leads towards disturbance of planned load generation balance. As such the OA consumers should adhere to the schedule on continuous basis for 8 hours as proposed in the amendment.
  - e. The consumer representative stated that since the Forum of Regulators has already endorsed the report of working group on open access in its 62<sup>nd</sup> meeting held on 15<sup>th</sup> December, 2017, the proposed amendment is a right step initiated by the Commission. However, in case any practical difficulty arises in its implementation, the same may be addressed through consultation process with concerned stakeholders.
  - f. The representative of M/s Ambuja Cements Ltd. stated that demand/load forecasting is a basic function of Discom. Uncertainty is inherent in the consumer demand because a normal consumer is not supposed to take approval of Discom before switching off or on its load. So there may not be any difference between normal consumer and OA consumer as far as aggregated power procurement planning of the Discom is concerned. The

OA consumers are already paying the contract demand as well as additional surcharge so there should not be any non-tariff barriers which act against implementation of open access option to the consumers.

- g. The representative of HPSEBL stated that the open access in distribution may have been envisaged in a scenario where there was power shortage in the country. He quoted the provisions of Section 42 (2) of the Electricity Act, 2003 and further stated that the State Commission has already allowed open access in the State. He pointed out that the open access consumer in distribution are not adhering to their schedules and buying power from power exchanges only upto on pre-determined rate in different time slots. This practice leads to gaming and further loss to the Discom. In the State of Himachal Pradesh we have already adopted the concept of 24x7x365 power supply to the consumers. The open access consumer may purchase power on uniform RTC basis and there should be no deviations in the schedule given by open access consumers for day ahead to minimize the onus of HPSEBL on account of deviations in schedule. He further stated that except for his suggestion for stipulating the minimum time of 24 hours instead of 8 hours, proposed amendment is in order.

## **11. Commission's Analysis.**

The stakeholders have made number of submissions, which are varied in nature. Whereas, the Short Term Open Access (STOA) consumers, individually as well as through association and the IEX, have emphatically objected to the proposal, others like DISCOM, SLDC and HPPTCL (STU) are in favour of the proposal. DISCOM is in fact in favour of increasing the proposed minimum provision of 8 hours to 24 hours in a day. We have considered the submissions, written as well as oral, in requisite detail. Some of the main submissions and views of the Commission on the same have also been outlined in the following paragraphs:-

### **11.1 Draft Amendment is ultra-vires the Parent Act and the Regulatory Framework.**

#### **Comment of Stakeholder(s):-**

Section 42(2) of the Electricity Act 2003 mandates that the State Commission shall by regulations, provide such open access to all consumers who require a supply of electricity where the maximum power to be made available at any time exceeds one megawatt. There is no bar on the duration of open access or quantum of open access in a period. Therefore, proposed regulations which restricts open access for variable quantum and specific duration is ultra-vires of Electricity Act 2003 and should therefore be dropped.

#### **Commission's view:-**

As per schedule 42(2) of the Act, the open access is to be allowed by regulations which is being allowed in the State and shall continue to be allowed

even after amendment of regulations. As such there is no question of violating the Act. In fact the Act does not clearly make any provision for Short Term Open Access and can also be interpreted to allow open access only on permanent basis so as to meet the real objective. However, the proposed amendment only envisages the minimum no. of hours for which open access can be sought by a short term open access consumer. It also does not debar the consumer to avail Short Term Open Access even for a period of less than 8 hours if the final schedule envisages so even after submission of the bid for the proposed minimum period. However, the consumer may have to pay additional surcharge at enhanced rates in such cases.

## **11.2 Jurisdiction of State Commission.**

### **Comment of stakeholder(s):-**

The present STOA Regulations and any proposed amendment will not be applicable to the collective transactions on the power exchange. This is further substantiated by the Detailed Procedure prevalent in the State. In line with Regulation 5 of the STOA Regulations, the State Commission has, approved and notified the detailed procedure for Short Term Open Access in intra-State transmission and distribution system. In terms of Clause 4.6 of the Detailed Procedure, Inter-State STOA transactions or transactions on the platform of the Power Exchange are to be governed by the CERC Open Access Regulations and the Detailed Procedure as specified by the Regional Load Despatch Centre, i.e. NRLDC is to be followed. Apart from adjudicating upon denial of NOC by HPSLDC, the Commission cannot exercise any jurisdiction on Inter-State STOA transactions and CERC will have jurisdiction in all aspects of inter-State open access.

### **Commission's view:-**

The present proposal relates to open access through Distribution System which falls under the purview of SERC. Moreover, the present proposal does not envisage any changes in regulation 5 of HPERC's STOA regulation or Clause 4.6 of the deviation procedure, which though mentioned here are not a subject matter of discussion under this proposal.

In fact Rajasthan Electricity Regulatory Commission (RERC) has already restricted frequency of switching of consumers from open access to distribution licensee in the following ways:-

“The power purchase under short term inter-State open access including transactions through power exchange shall be subject to the following:-

- The consumer shall schedule power from open access for complete 24 hours of the day.

- The schedule so given shall be uniform at least for a period of 8 hours and the minimum schedule during the day shall at any time not be less than 75% of the maximum schedule of the day”.

Moreover, the Madhya Gujarat Vidyut Company Ltd. (MGVCL) also gets an undertaking alongwith application for grant of open access with regard to purchase of power uniformly throughout the day.

### **11.3 Need for promoting competition.**

#### **Comment of stakeholder(s):-**

- (i) In case a consumer of Discom procuring power from third party through open access, then that third party is the competitor of such distribution licensee. The Commission has proposed drawl of uniform quantum of power for a continuous period of 8 hours and unbroken period of drawl. If such a condition is applicable to all consumers of the Discom then certainly such provision may not be anti-competitive. However, in present case, the proposal is to impose an additional condition only on the open access consumers procuring power from third party. This certainly will give an upper edge to the Distribution Licensee over the third parties and will clearly make the environment anti-competitive and biased in favor of the Distribution Licensee.

The preamble of the Electricity Act, 2003 prescribes ‘promoting competition’ as one of the object of the Act and as explained above, proposed provision of drawl of uniform quantum for 8 hours and unbroken period of drawl in a day is anti-competitive thereby contravenes the Electricity Act, 2003, therefore, is liable to be dropped.

- (ii) Since the short term open access consumers are paying demand charges, there should be no tariff barriers which act against implementation of open access to the consumer(s).

#### **Commission’s view:-**

We observe that the diversity in the normal energy consumption of the consumers is a normal feature which is duly captured in the load forecasting and tariff setting. However, the Short Term Open Access (STOA) by the selected consumers of DISCOMs constitutes a unique and special feature which is difficult to capture in the normal load forecasting and tariff due to uncertainty linked with the fluctuation in the market rates. Moreover, this also needs to be self sustaining and its impacts cannot be passed on to the consumers. The facilities available to the consumers of DISCOM are uniformly available to all the consumers of that category, including those who are availing certain power through Short Term Open Access. The DISCOM is also mandated to meet the

requirement of the consumers availing Short Term Open Access at par with other consumers of the same category, in the event of non-availability of power under Short Term Open Access. We will also like to mention here that such provision is also necessary keeping in view the fact that the demand charges presently applicable for the consumers of these categories do not facilitate recovery of all the fixed costs and some of the fixed costs are essentially recovered through energy charges only. Since the consumers availing open access purchase only a part of their normal requirement of energy from DISCOM, the fixed charges are not fully recovered in their case. There is always a shortfall in recovery of fixed expenses from such consumers which causes losses to DISCOM. The comment that the proposal is anti-competitive is therefore not correct and in fact the proposal tends to create healthy competition following a balanced approach. As such the plea made by the objectors in this regard does not hold good. As a matter of fact, non-imposition of suitable restrictions as envisaged in the proposed amendment could lead to situations which may be anti competitive.

#### **11.4 Ministry of Power paper/FoR recommendations devoid of Data and Merit.**

##### **Comments of Stakeholder(s):-**

- (i) The present amendments have been proposed by the Commission considering Ministry of Power's Consultation Paper on Open Access and recommendations of Working Group of Forum of Regulators (FOR) to mandate scheduling of power for at least 24 hours to prevent frequent switching between Discom and Open Access. The main issue is raised by the Discoms due to frequent switching by open access consumers, the distribution companies are exposed to huge losses. Reference has also been invited to discussions held by Forum of Regulators (FoR), on the consultation paper of Ministry of Power (MoP), in their report on open access issues in December, 2017, in which it has been suggested that open access consumers should schedule continuous 8 hours supply instead of 24 hours.
- (ii) Neither Ministry of Power (MoP) Consultation Paper nor the Forum of Regulators report gives any evidence or data as what losses DISCOMs are incurring which are not being compensated by statutory provisions of cross subsidy surcharge and additional surcharge. The MoP paper and FOR Reports are based on mere statements recorded on the paper by representatives of DISCOMs and recommendations have been made without any conclusive data and facts.

- (iii) Reference to Ministry of Power Consultation Paper and Forum of Regulators Recommendations is misconceived and any reliance on the aforesaid documents will be incorrect. The Commission is required to carry out a detailed analysis to determine what losses are being incurred by the Distribution Licensee in the first place before any amendment is introduced.
- (iv) It has been requested that the consumers' may direct HPSEBL to file the relevant data and material to show the actual losses, if any that are being incurred by it due to the alleged frequent switching of sources by the STOA consumers. HPSEBL is required to demonstrate that the alleged losses are not being recovered through levy of Additional Surcharge and Cross-subsidy surcharge for determination of enhanced rate of additional charges is being created.

**Commission's view:-**

The proposal envisages provisions for submission of uniform schedules for continuous 8 hours instead of 24 hours envisaged in MoP paper. The present proposal only aims at discouraging STOA consumers from resorting to unhealthy practices which could lead to gaming. So far as the determination of the additional rate of additional charge is concerned, only an enabling provision is being created under the present proposal and the actual rate shall be determined only after following the due process. Needless to mention, the Commission shall exercise due diligence at the time of determination of such rate(s). The working group had made the following recommendation in relation to scheduling of power by open access consumers that:-

“Measures like scheduling of power for certain slot of time i.e. for at least 24 hours, may be strictly followed, to prevent frequent shifting”.

The Forum of Regulators after detail deliberation, endorsed the report of working group on open access in its 62<sup>nd</sup> meeting held on 15<sup>th</sup> December, 2017.

**11.5 Submission of Schedules.**

**Comments of stakeholder(s):-**

- (i) It has been submitted by IEX that switching of supply by the open access consumers is not in real time but the open access consumers provide scheduling well in advance and there is enough room for Discom/SLDC to manage their demand/supply for the next day ahead with reasonable certainty.

- (ii) The representative of HPSEBL has submitted that the consumers tend to submit the schedule only for selective slots in which they find the rate to be cheaper. Moreover, since the schedules are approved keeping in view the rates bid by them, the quantum of power which shall actually be scheduled remains un-certain. DISCOM cannot bear the financial burden caused to it in the situations where the consumers tend to follow practices which could lead to gaming and also impact the planning of the DISCOMs for the day ahead, causing additional financial burden for the DISCOM.

**Commission's view:-**

After considering the matter in detail and also keeping in view the fact that DISCOM is mandated to meet the energy requirement of such open access consumers at par with the other consumers of similar categories of consumers even in case of non-availability of power under open access after submitting application for open access, we observe that the difficulty expressed by the DISCOMs in this regard is genuine. The proposed amendment shall take care of such difficulty at least to some extent, if not fully. Even though the DISCOM has stressed for a uniform schedule on RTC basis i.e. for 24 hours in a day, we decide to retain the provision for uniform schedule only for 8 continuous hours in a day. We feel that the proposed amendment shall motivate the open access consumers to submit their bids on realistic basis in a manner which causes minimum adverse impact on the planning of DISCOM.

**11.6 Acceptation of Bids.**

**Comment of stakeholder(s):-**

Short Term Open Access consumers submit their bids to the respective energy exchange based on various factors such as the price requirement, clearing rate and ratio, availability of power etc. Even if a consumer submits its bid for availing STOA for a continuous period of eight hours, there is no surety that the said bid will succeed and the consumer will get short-term power for the entire eight hour period. Pursuant to the proposed Amendment in a majority of cases the consumers will thus be precluded from availing STOA completely because their bids did not succeed for some time blocks out of the entire 24 hour duration. Therefore, implementation of the proposed amendment is practically and operationally impossible.

**Commission's view:-**

The draft regulations envisage restrictions/conditions only on the day ahead schedules to be submitted by the open access consumers and not on the day ahead schedules to be approved by the concerned authority. However, enabling

provision for charging extra of additional surcharge is being created to cover up such situations. Moreover, the proposal only envisages submission of uniform schedule only for minimum 8 continuous hours and not 24 hours in a day. The proposed amendment duly addresses the situations under which the bid made by Short Term Open Access (STOA) consumers for a uniform quantum of power for at least 8 hours is accepted. As such the comment made in this regard does not find any merit for further consideration.

#### **11.7 Impractical condition.**

##### **Comments of Stakeholder(s):-**

- (i) The proposed amendments are not only anti-competitive but also impractical approach since deviations are inherent in the nature of electricity and is inevitable.
- (ii) Since the HPSEBL is having different tariff rates for different timings, it is not possible to bid in pool of 8 hrs.

##### **Commission's view:-**

The present amendment does not, in any way, suggest that deviation in the schedule vis-à-vis actual can be totally avoided. In fact, the deviation by Short Term Open Access (STOA) consumers are accounted for under a mechanism devised in the detail procedure, after following a very liberal approach. Moreover, the different rates under DISCOM's tariff for different timings also do not in any way debar the consumers to seek/avail open access for continuous 8 hours.

#### **11.8 Principle for determination of higher additional surcharge.**

##### **Comment of stakeholder(s):-**

The draft regulation making mere mention of higher rate of additional surcharge to be levied to the open access consumers in case of violations is abstract in nature. The Commission is requested to specify the basic principle for determination of higher additional surcharge and seek comments thereon.

##### **Commission's view:-**

The main objective of the proposal is to discourage the unhealthy practices which STOA consumers tend to follow and could lead to gaming. The methodology for determination of the enhanced addition surcharge shall be evolved by the Commission at the time of determination of such rate at appropriate stage after taking into account for factual position.

### **11.9 Insignificant quantum.**

#### **Comment of stakeholder(s):-**

The amendment should not be carried out as the total quantum of the energy availed by the consumers under Short Term Open Access (STOA) is about only 2% of the total requirement.

#### **Commission's view:-**

We observe that the average annual data or even the average monthly data referred to by the objector is not relevant for assessing the gravity of situation highlighted in the paper of Ministry of Power as well as by DISCOM. In any case, the present amendment only seeks to make an enabling provision under which the Commission may fix different rates for additional surcharge to take care of such situations. The actual rate is not presently being fixed in these amendment regulations and the same shall be determined only after following due process.

### **11.10 Rates to be fixed at reasonable levels.**

#### **Comment of Stakeholder(s):-**

Para 5.8.3 of the National Electricity Policy clearly states that the amount of Surcharge and Additional Surcharge levied from consumers who are permitted open access should not become so onerous that it eliminates competition. Para 5.8.3 of the National Electricity Policy is reproduced below for ready reference:

*"5.8.3 An additional surcharge may also be levied under sub-section (4) of Section 42 for meeting the fixed cost of the distribution licensee arising out of his obligation to supply in cases where consumers are allowed open access. The amount of surcharge and additional surcharge levied from consumers who are permitted open access should not become so onerous that it eliminates competition that is intended to be fostered in generation and supply of power directly to consumers through the provision of Open Access under Section 42(2) of the Act. Further it is essential that the Surcharge be reduced progressively in step with the reduction of cross-subsidies as foreseen in Section 42(2) of the Electricity Act 2003."*

Thus the proposed increase in additional surcharge is against the spirit of Electricity Act, 2003 as well as the National Electricity Policy 2005 since higher additional surcharge as proposed would definitely make open access power unviable and would also impact the competition adversely.

#### **Commission's view:-**

The present proposal only aims at discouraging the Short Term Open Access consumers from resorting to unhealthy strategies which could lead to gaming and does not in any way violate the provision of National Electricity Policy. No rate is being fixed at present under the proposed amendment.

### **11.11 Huge penalties for Deviations.**

#### **Comment of stakeholder(s):-**

For collective transactions through the Power Exchanges, once the power is traded, the schedule is fixed for the next day and the same cannot be revised. There are huge penalties on open access consumers on deviating from this schedule. The correlation between open access consumers scheduling and deviation penalties is not sufficient parameter to arrive at a conclusion.

#### **Commission's view:-**

The proposal does not have any direct relevance with the amount of penalties, if any, on open access consumers in case of deviations from schedules. The proposal, in fact, primarily aims at discouraging the Short Term Open Access (STOA) consumers from following the strategies which may lead to gaming. Such unhealthy practices obviously need to be curbed for implementing the objectives of the Act in real spirit. We shall also like to mention here that as per the detailed procedures approved by this Commission, the penalties payable for deviation by STOA consumers are very nominal.

### **11.12 Clarification of about competent authority.**

#### **Comment of stakeholder(s):-**

The Terms "seek" and "competent authority" need to be defined so as to avoid any confusion later on. Going by the English vocabulary, the objector understand the meaning of "seek" as request by the objectors for power/energy to power exchange and "competent authority" is power exchange i.e. IEX.

#### **Commission's view:-**

The word "seek" carries ordinary dictionary meaning and relates to the proposal to be made by consumer willing to avail STOA in his day ahead schedule and the term "competent authority" relates to the authority which approves and issues the final schedule. In order to avoid any confusion, we decide to replace the term "competent authority" appearing in the amendment regulations with the words "agency competent to finalize and approve the day ahead schedule."

### **11.13 Competitiveness of DISCOM's rates.**

#### **Comment of stakeholder(s):-**

The consumers would think of alternative sources of supply only if the HPSEBL fails to supply power at competitive rates. Rather the HPSEBL should supply at cheaper rates in comparison so that the permanent consumers hold on to it through thick and thin. The HPERC has also to ensure safeguarding the consumer's interest.

**Commission's view:-**

We feel that the comment could be valid only for Long Term Open Access (LTOA) and not the Short Term Open Access (STOA). The STOA may not promote any healthy competition if the STOA consumers tend to resort to the practices which lead to gaming as explained by HPSEBL in their oral submissions.

**11.14 Rebate in wheeling charges.**

**Comment of stakeholder(s):-**

The same FoR Working Group has also recommended that the wheeling charges to the extent of Demand Charges may not be charged from embedded consumers. But in reality relief has been granted in part only in HP.

**Commission's view:-**

This is not the subject matter of proposed proposal.

- 12.** After considering all the written and oral submissions made by various stakeholders, including those specifically discussed above, we decide to retain the proposed amendment regulations without any change except for that decided in para 11.12 and also approve the same for being notified accordingly.

Sd/-  
(Bhanu Partap Singh)  
**Member**

Sd/-  
(S.K.B.S. Negi)  
**Chairman**

Date: 11. 06.2018  
Place: Shimla.

**Annexure-“A”****List of stakeholders/participants attended the Public Hearing held on 19.05.2018.**

Sr. No.	Name
1	Er. Suneel Grover (Chief Engineer), HPSEBL.
2	Er. Deepak Uppal, (Dy. Chief Engineer), HPSEBL.
3	Er. Rajiv Sood (SE), SERC, HPSEBL.
4	Er. R.K. Dhiman (DGM, Civil) HPPTCL.
5	Sh. I.P. Singh, HPPTCL.
6	Er. Ajeet Kumar (Chief Engineer), SLDC.
7	Er. K.S. Sambyal (SE), SLDC.
8	Sh. Gaurav Maheshwari (Sr. Manager), SLDC.
9	Sh. Anshul Gupta (Manager), ACC Limited.
10	Sh. Charanjit Singh, Consumers Representative, HPERC.
11	Sh. Tanuj Gupta (Dy. General Manager), Ambuja Cement Ltd.
12	Sh. P.C. Diwan (Advocate), Ambuja Cement Ltd.
13	Sh. V.M. Nayyor, Inox Air Products.
14	Sh. Upender Verma, MPPL.
15	Gaurav Maheshwari, Sr. Manager, Indian Energy Exchange.