# BEFORE THE MADHYA PRADESH ELECTRICITY REGULATORY COMMISSION

#### **BHOPAL**



#### **Petition No. 04/2003**

Date of Order: 9th December 2004

Present: Hon'ble Shri P.K.Mehrotra, Chairman

Hon'ble Shri D.Roybardhan, Member (Engg.)

Hon'ble Shri R.Natarajan, Member (Econ.)

#### Madhya Pradesh State Electricity Board

**Petitioner** 

The Madhya Pradesh Electricity Regulatory Commission (MPERC) having considered the written objections, heard the views of the objectors in a public hearing dated 15.10.2004, the replies of MPSEB and after a detailed perusal of the documents available on records passes the following order in exercise of powers vested in it through section 45, 46, 47 and 50 of the Electricity Act, 2003 and all other powers enabling it in this behalf. The order shall be effective from 1<sup>st</sup> January 2005...

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#### A1: INTRODUCTION

- 1.1 Miscellaneous & General charges form a part of the non-tariff income that is recovered from consumers in lieu of specific services provided on consumers' request. These services are of the nature of meter replacement, new connections, fuse-off calls etc. The Commission is empowered to approve these charges as per powers vested through sections 45, 46, 47 and 50 of the Electricity Act 2003. This order of the Commission pertains to determination of the Miscellaneous and General Charges that MPSEB may charge to the consumers for the specific services mentioned in the schedule of charges.
- 1.2 Since its inception, the Commission has issued two tariff orders, the first one on 26th September 2001 and the second one on 30th November 2002. The revised tariffs as per the Second Tariff Order came into effect on 19th December 2002. The Commission had, vide its order dated 30th November 2002, directed MPSEB to come up with all types of miscellaneous and general charges along with complete justification by 31<sup>st</sup> December 2002, for scrutiny by the Commission. Till such time, the Commission allowed MPSEB to charge the miscellaneous charges as appended with the Tariff order dated 30<sup>th</sup> November 2002.

#### A2: PROCEDURAL HISTORY

- 2.1 Consequent to the Commission's direction, the Board submitted a petition on 06.01.2003. On review of this petition, the Commission found it to be incomplete on account of non- inclusion of certain charges and/or inadequate explanation on the rationale for revising existing charges.
- 2.2 The Commission, meanwhile, appointed a working-group, which included officers of the commission and nominated officers of the Board. This working group studied the petition in detail and based its analysis on certain methods and principles that would be most suited for prudent revision of charges. Based on this analysis, the Board was directed to revise its proposal and provide necessary justification for the charges.
- 2.3 The Board requested for an extension of the time limit for submission of revised consolidated petition. The revised petition was thereafter submitted by the Board on 25.06.2003. An in-depth examination of the revised proposal of the Board was held. Based on which the Board was directed to provide additional information. This was provided by the Board on 24.07.2003 & 03.03.2004. There has been considerable delay on the part of the Board to provide timely submission of justifications and additional information required.
- 2.4 Based on the recommendations of the working group the proposals were revised and took a conclusive shape in form of a consolidated petition, the English version of which was re-submitted during hearing dated 17.3.2004. Subsequently, the Commission conducted a series of hearings with the Board to review the charges.

- 2.5 The Commission directed the Board to issue public notice for the information of the general public about details of petition submitted by MPSEB for inviting responses from all stakeholders. A public notice was published in the newspaper on 10.6.2004 and comments/objections were invited upto 30.06.04.
- 2.6 In response to the public notice, various objections were received. On request of some consumers the last date for submission of comments was extended upto 15.7.04. The Board was directed to send reply to the objectors and submitted it to the Commission by 28.8.2004, which was however submitted on 2.9.04
- 2.7 On 15th October, 2004 the Commission held a public hearing on Miscellaneous and General Charges where objections of various consumers and consumer forums were represented and answered.
- 2.8 The petition underwent a rigorous scrutiny and an in depth analysis was undertaken with justifications, with explicit details wherever necessary.

# A3: COMMISSION'S PHILOSOPHY: PRINCIPLES AND METHODOLOGY OF MISCELLANEOUS CHARGES

3.1 The Commission's philosophy is to base the miscellaneous and general charges on the principle of cost causation as far as possible. The determination of these charges should consider the purpose of the service being undertaken, nature of connection to be serviced, i.e., the connected load of the installation, whether it is single phase or three phase, whether it is a low tension or a high tension connection etc. Based on the Commission's philosophy, the Board submitted a petition to reflect the principles of and methods as detailed in the MP (Methods and Principles of Determination of Charges) Regulation, 2004<sup>1</sup>. This is a paradigm shift in the treatment of such charges from the earlier petitions and Madhya Pradesh is one of the few states to revise the charges on these principles in the post Electricity Act 2003 era.

### Principles of framing miscellaneous and general charges

3.2 The basis for charging as proposed by MPSEB are as under

**Table 1: Boards Proposal on charges** 

Particulars	Basis for Charging
Meter Rent	On average cost of meter/metering system
Other charges (changing of the meter board, replacement of fuse, disconnection, resealing, etc)	Based on work study
Testing charges	Based on work study
Contest fee for billing meters	Based on work study
Security Deposit	On consumption equivalent to specified number of days.
Charges for arranging supply	Based on actual cost of extending the infrastructure for supplying electricity + capacity building charge for per KVA capacity, addition at various voltage levels of
Service connection charges	On basis of current market price of cost of materials
Recovery of cost of burnt and damaged meter	The actual cost of meter, store incidental charges, supervision charges
Shifting of connection from one place to another	Actual Estimates
Supervision charges	Percentage of cost of estimate of the work
Hire of plant and equipment	Replacement cost of the equipment
Charges for requisition forms and booklets	Actual Costs

<sup>&</sup>lt;sup>1</sup> For details on the methods and principles of determination of each charge, please refer to this Regulation.

Fee for special meter reading	Work Study
Power Block Charges	Imputed cost of revenue loss due to blocking of electricity supply for railway maintenance
Temporary supply (Tatkal Yojana)	Costs and effort required
Fee for verification of old dues	Effort estimate
Street light maintenance charges	Estimation in cost percentage hike over the year 1999.

- 3.3 The above charges can be bifurcated into two broad heads for the purpose of reviewing and determining the charges.
  - (a) Those that can be determined on basis of **Work Plan Study**.
  - (b) Those that can be based on **Actual Estimates** of costs.
- 3.4 It was felt that charges based on the Work Plan Study, are work-oriented and involve efforts by the technical staff for the specific services provided. Various factors should be taken into account while computing these charges such as salaries of persons, number of hours required for completing a job, the number of jobs attended to in a day, etc.<sup>2</sup>

#### A4: SUMMARY OF OBJECTIONS/SUGGESTIONS

#### List of stake holders

4.1 In response to the petition on miscellaneous and general charges, a list of consumers/associations submitted their comments and objections. A list of consumers who made their representations in form of written submissions and those present on the day of the hearing are as given in annexure II

# Suggestions/Objections of Stakeholders and MPSEB Response

- 4.2 The common issues raised by the objectors on petition for miscellaneous and general charges are as follows:
  - (a) It was felt that revision of miscellaneous and general charges was not called for since most of these charges had been revised in the year 2000. Hence, it was suggested that these charges should be revised only after issue of tariff order for FY 2004-05.

<sup>&</sup>lt;sup>2</sup> For illustration of calculations, refer MP (Methods and Principles of Determination of Charges) Regulation, 2004

- (b) The objectors were not convinced with the cost plus approach followed by the Board in framing the miscellaneous charges and felt that there is a possibility of evolving a market brand pricing for miscellaneous charges through competent contractors by invitation of bids.
- (c) The stakeholders also gave their suggestion on evoking a stronger public response and hiring of independent consultants who would analyze the documents, which were too intricate and technical to be comprehended by general public.
- (d) The representatives also raised objections to various charges, which needed to be either rationalized or deleted.
- (e) The representatives also suggested a ceiling limit that should be adhered to at the time of revision of miscellaneous and general charges. The proposed ceiling should not exceed 10% of the total revenue of the MPSEB.
- 4.3 Enlisted below is the summary of objections and response of Board on the same:-

#### **Objector: National Centre for and Environment**

- 4.4 It was represented that revision of miscellaneous charges should take place only after tariff petition hearings these charges had been recently revised on 1.7.2000.
- 4.5 **MPSEB Response** Only few of miscellaneous charges had been revised on 1.7.2000 and revision of various other charges was long over due. It is for the first time miscellaneous charges are proposed on sound economic principles and based on work plan study.

# Objectors: Consolidated Energy Consultants and M.P. Electricity Consumers Society, Indore

- 4.6 **Objection on Procedural Anomalies** In the representations it was pointed out that filing of a separate petition for miscellaneous charges led to a procedural anomaly since these charges were the part and parcel of tariff and should have a place and should ideally form a part of tariff petition. Hence, a separate petition for miscellaneous charges was not required.
- 4.7 **Response** The Board endorsed the above suggestion and admitted that these charges fall under the purview of main tariff petition. However, since the filing of the instant petition was taking place after a period of 5-6 years, a consolidated filing could not take placed yet in near future the Board would take steps for simultaneous and consolidated filing.

- 4.8 **Objection on Impact on Revenue due to revision of miscellaneous charges** The objectors felt that any revision of miscellaneous charges was not justified, as it would have an impact on raising overall revenue of the petitioners. The estimated revenue and the miscellaneous receipts form nearly 10% of the total revenue. Hence, any further revision would lead to a rise in revenue of the Board.
- 4.9 **Response** The Board stated that due to revision of miscellaneous charges the overall increase would not be substantial. The hike in miscellaneous charges would account to just a marginal increase of 10-12 crores per annum which is justified keeping in view a long period after which the charges are revised. Moreover the charges do not yield additional revenue for the Board as the charges are fixed in a manner so as to recover the costs incurred.
- 4.10 **Objection regarding Principle methodology and operational issues in framing miscellaneous charges** The objectors also contested the methodology on which these charges were based. The cost plus approach adopted in framing these charges would perpetuate inefficiency. The objectors also suggested that a pre-condition to fixing of miscellaneous and general charges should be inviting bids from contractors and franchisee. It also hinted the possibility of exploring a potential for miscellaneous charges through competitive contractors.
- 4.11 **Response** The Board stated that charges were based on detailed work plan study and cost plus approach would not promote inefficiencies, however, it was open to reviewing a market for miscellaneous charges and fully endorsed that invitation of bids, contractors, tenders would be explored in future.
- 4.12 **Objection** -It was felt that MPSEB had debited entire employee cost to construction work, which was not justified.
- 4.13 **Response** The Board responded that these objections were incorrect since revision of miscellaneous charges was based on work plan study.

Objections/suggestions for rationalization/reduction/elimination of various miscellaneous charges

- 4.14 **Meter Hire Charges**: Meter hire rental charges are recovered under Section 45(3)(b) of the Electricity Act, 2003. The Board had proposed to revise these charges on current basis at 2.3% per month. The objectors felt that these charges were exorbitant and did not compare favourably even to the CERC norms or meter rent for NTPC. It was felt that these charges cannot be more than 1.5%. A higher meter rent was on account of higher interest burden on loans taken for procurement of meter. It was submitted that these charges need a revision and should be scaled down to 1.5% per month.
- 4.15 **Testing charges/contest fee for billing meters**: These charges should be fixed after laboratory is set up independently by MPSEB in a year's time through competitive bid.

- 4.16 **Supervision Charges**: These charges as proposed by Board vary from 5-24%. Such a variation in rates is not called for. It was submitted that third party supervision agency be set and these charges do not exceed more than 7-8%.
- 4.17 **Supply Arranging Charges**: The Board proposes to replace supply arranging charges with capacity building charges. It was submitted that since these charges pertain to infrastructure development involving huge capital expenditure they should not be recovered from individual consumers rather they should be part of annual revenue requirement. These charges should only be fixed after reviewing and accounting for funds available by ADB, accelerated power and reform development programme funds and loan availed from other financial institutions.
- 4.18 **Rationalization of other charges**: It is suggested that a number of proposed charges, such as mentioned below, need to be done away with
  - (a) Charges for requisition forms
  - (b) Hiring of Board's plant and equipment
  - (c) Power block charges
  - (d) Fee for due settlement committee
- 4.19 Since some of the services like information for requisition, hiring of Board's plant and equipment etc. are routine services and therefore should not be charged for. Power block charges, fee for due settlement committee, compensation charges etc. need to be deleted.
- 4.20 To conclude, representations pertaining to different miscellaneous charges suggested as follows:-
  - (a) Ceiling limit that should be abided by the Board
  - (b) Inviting of third party open tenders, bids wherever possible
  - (c) Deletion of certain charges that form a part of routine services of the Board.

#### Objector - Shri B.L.Jain, Jabalpur

- 4.21 The objector submitted that replacement of old meters by electronic meters is not justified It imposes additional burden on consumers.
- 4.22 **Response** The replacement of old meters by electronic meters is justified since these meters are technically more superior.

#### **Objector - Shri Krishna Das**

4.23 Objections were raised on proposed hike of miscellaneous charges as it imposes additional burden on consumers.

4.24 **Response** - The revision of miscellaneous charges was long overdue and is justified in view of the inflation that has taken place over the years and also that now the charges are proposed on work plan study.

#### Objector - Rajnikant Pandya

- 4.25 The consumer should be free to purchase their own meters and no testing charges should be charged for the first time.
- 4.26 **Response** The Board has no objections and stated that consumers are free to purchase their own meters. No response was provided on testing charges for the first time.

#### **Objector:**

- (a) Upadhayaksh, Chhatra Sangram Katni
- (b) Shri Jagdish Prasad Gupta:
- (c) Shri Jatav
- 4.27 Their objections pertained to levy of fixed and energy charges and were not relevant for miscellaneous charges

#### Objector - Shri Amba Ram Mukati

4.28 The proposed revision of miscellaneous charges was not justified and should be as follows:-

Table 2: Rates proposed by Objector

Miscellaneous and General Charges	Rate ( Rs.)		
Replacement of Meter/ Meter Board	100		
Replacement of Meter Board Request	50		
Disconnection/ Reconnection Charges	30		
Resealing Charges	70		
Testing Charges			
a)Single Phase	165		
b)Three Phase	450		
Security Deposit	One month of assessed Consumption(for agricultur consumers)		
Supervision Charges	a) 3% if agriculture consumer undertakes the construction work		

It was also suggested not to increase compensation charges and not to levy additional charge on transfer of connection. , if transformer remains same.

4.29 **Response** - The Board was unable to respond to the above objector and stated that objections were received late

#### **A5:** COMMISSION'S ORDER ON MISCELLANEOUS CHARGES

5.1 After an in-depth analysis of the petition and after considering the suggestions/objections raised during the public hearing and the response of MPSEB, the Commission has determined a set of charges. Keeping in mind the interests of the consumers as well as of MPSEB, Commission has rationalised some of the charges and removed some others which were not considered necessary or justifiable. At the same time, some new charges, which were previously not levied, have been incorporated to enable MPSEB to charge for those particular services. In determining the various charges, the Commission has also kept in mind the fact that the income from the levy of Miscellaneous Charges for services rendered is deducted from the Annual Revenue Requirement and hence consumers at large are getting the benefit in tariff determination.

### Meter rental charges

- MPSEB recovers meter rental charges under Section 45(3)(b) of the Electricity Act 2003. The Board has proposed to charge at 2.3% per month of the cost of metering equipment, which implies a recovery of total cost of meters/ metering equipment in 3.6 years approximately. This is based on historical percentage and the Board has not provided any rationale for it. In its petition, the Board has sought to revise the costs at 2.3% based on the revised average costs between FY00 and FY03.
- 5.3 The Commission has not been provided a sound rationale for charging 2.3% per month. Besides, it is reasonable to assume that meters may generally be replaced every 5.5 years and this is also the guarantee period given by manufactures. This translates into a rate of 1.5% per month of the cost of meter/ metering equipment. The Commission compared the meter rent charges with several other states and found the rates proposed by the Board to be high.
- 5.4 Based on the above analysis, the Commission has determined the charges as under.

**Table 3: Charges for Meter Rent** 

Particulars	Existing Proposed		Approved
	Rs/meter/month	Rs./meter/month	Rs./meter/month
HT Meters			
H.T. For 220 KV system meter alongwith CTs, PTs Cable etc.	32730/-	35236	22980
For 132 KV System meter alongwith CTs, PTs Cable	16120	17733	11565
For 33 KV System meter, CTs, PTs meter box etc.	2040	2166	1415

For 11 KV System meter, CTs, PTs meter box etc.	1540	1588	1035
LT Meters			
(i) Single phase energy meter without MCB	12	17	5
(ii) Single phase meter with MCB	16	19	6
(iii) Poly phase meter without M.C.B	25	28	12
(iv) Poly phase meter with MCB.	36	36	14
(v) Poly phase LT meter with CTs	45	118	50
((vi) Demand or special type Meter	184/- or 2.3% of cost of metering system	184/- or 2.3% of cost of metering system	100

### Other Miscellaneous and General Charges

- 5.5 These cover the following charges
  - 1. Shifting of Meter Board with Meter within the same premises
  - 2. Replacement of Fuse/glass/meter cards
  - 3. Disconnections/Reconnections
  - 4. Resealing of meters, MD indicators and instruments of the Board in the consumers premises if seal is found broken
  - 5. Re-rating of installations where done at the request of the consumer
  - 6. Testing of Installations
- 5.6 The Board has proposed the revision of these charges based on the effort estimate/work plan study as suggested by the working group of the Commission. The Commission has allowed most of the charges proposed under this head. Some of the charges however were found to be on higher side, keeping the interest of all stakeholders the Commission approves following charges.

**Table 4: Other Miscellaneous and General Charges** 

		Existing	Proposed	Approved		
1	Shifting of meter Board with meter within same premises	Rs./job	Rs./job	Rs./job		
	(i)Changing of meter/meter Board position within same premises *	50	135	50		
	(ii)Resealing of cut outs of the meter Board in the insumer's premises, if seal is found broken	13	55	15		
	* No request for change of meter shall be entertained unless contested and unless s	such a challenge is	upheld	•		
2	Replacement of Fuses/glass/meter cards					
	Replacing consumer's cut out fuses (LT)	20	20	20		
	(ii) replacement of missing meter cards	Rs.10/card	Rs.10/card	Rs. 5/ card		
	(iii) replacement of broken glass of single phase/ three phase meter	24	24	24		
3	Disconnections/Reconnections **					
	(I) Up to 25 KW					
	(i)At overhead mains***	150	135	125		
	(ii)At underground mains	400	520	500		
(II) Above 25 KW up to 75 KW (100 HP)				-1		
	(i)At overhead mains	Add 25% to above charges 3(1) (i)	520	500		
	At underground mains	Add 25% to above charges 3 (1) (ii)	520	500		
	(III) Above 100 HP(75KW) upto 5 MVA		2350	1000		
	(IV) Above 5 MVA upto 25 MVA	Add 50% to 3(1) (ii)	4000	1250		
	(V) Above 25 MVA	- ( ) ()	6000	2000		
	** Charges proposed to be recovered include charges for disconnection as well as reconnection					
	*** Charges at cut outs and overhead m	nains shall be t	the same			
	In case of broken meter glass, it shall be changed by utility a been done and the cost of damages shall be re			ampering has		

4	Re-sealing of meter MD indicators and instruments of the Board in The Consumer's premises if seal is found broken.	Existing	Proposed	Approved
	(B) For Three phase (Other than L&F) Connections :			
	(I) Industrial connections for loads upto 25 BHP (upto 10 HP in existing scale)	214	258	200
	(II) Connections above 25 BHP (without CTs) (above 10 HP in existing scale)	437	450	400
	(III) Connections above 25 BHP (with CT's or Special Type Meters)	437	800	550
5	Re-rating of installations where done on consumer request	Rs. per apparatus	Rs. per apparatus	Rs. per apparatus
	(I) Single Phase Connections	97	105	90
	(II) Three Phase Connections upto 10 BHP	97	210	110
	(III) Three Phase Connections above 10 BHP	97	380	125
6	Testing of installations after the first test of a new installation or if an extension to an existing installation is found to be defective or if the wiring contractor or his representative fails to be present	130	130	130

# Testing Charges for Consumers equipments at consumer request (Meters, CTs metering equipments)

- 5.7 These charges include testing charges of various equipments on consumers' request at Board's laboratory as well as site (consumers' premises). The Board has submitted a proposal to revise the existing charges.
- 5.8 The Commission feels that proposed charges are exorbitant and are very high compared to other States. Based on the review of each of the charges, the Commission approves the following

**Table 5: Testing of Meters** 

S.No	Particulars	Existing	Proposed	Approved
		Rs./job	Rs./job	Rs./job
1	Single phase energy meter	50	215	50
2	3 phase 3/4W energy meter without LT CT	75	530	75
3	3 phase 3/4W energy meter with LT CT	1000		1000
4	Special Meter bivector/trivector	1000	1065	1000
5	LTCT	300	425	300
6	33/11 KV Metering Equipments.	3000	4100	3000
	# if consumer contests the accuracy of his equipment and if the contest is found to be correct, the above amount shall be refunded			

Apart from the above charges, the Board has also proposed a Contest Fee for Billing Meters which is higher than the proposed testing charges, at least in case of 33/11 KV Metering Equipment. The Commission has removed the separate category for Contest Fee as the Commission feels that a contest fee which is higher than the testing fee would inhibit consumers from going for meter testing even in cases where it is justified.

### **Supply Arranging Charges**

- 5.10 These charges comprise the cost of extending infrastructure {laying of LT, HT lines and substation} plus a per KW system strengthening charge for up gradation of the system to cater additional load of the new consumers. At present the system strengthening charges are levied only on select consumers( legal colonies and multistoried complexes), while other are charged system charges or supply affording charges etc.
- 5.11 The Board proposes to replace this charge with a Capacity Building Charge that would be charged on a per KW basis at different voltage levels and would be applicable to all consumer categories. However, this charge shall be only a percentage of the actual capacity building charge. The Board recognises that the consumers might not be able to bear the burden of the entire cost.
- 5.12 The Commission is of the opinion that the system strengthening charge should be discontinued and no other similar charge should be levied in its place. This is because the system strengthening charge is for the up gradation and system improvement and is already provided for through capital investment using the Boards own resources or loans/grants taken for this purpose. In either case, these are charged in the Annual Revenue Requirement of the Board as interest expenses and as depreciation for capital assets created through the investments. Thus the source of funds for such charges should not flow from the miscellaneous charges schedule; rather it should be a part of Annual Revenue Requirement. These investments involve huge capital expenditure and long gestation periods and to charge it to any one consumer or class of consumers is not justified.
- 5.13 The Commission thus allows cost of material for extension of lines from distribution mains for arranging supply which would be borne by the consumer including 15% supervision charges. However, it opines that no Substation Cost and no capacity building charge will be recovered from the user/applicant.

## **Service Connection Charges**

5.14 These charges are levied for laying of service line from the Boards' distribution mains to the consumers' premises. The Board has proposed a 15% increase in the existing charges on the basis that there is substantial increase in the cost of labour and material.

5.15 The Commission directs that these charges should be based on the market rate estimated costs. The costs of material and labour should be based on a ready reckoner to be submitted to the Commission. The Board may charge supervision charges as a percentage of the cost of material in addition to the above as part of the total estimate for service connection charges. The Commission felt that these charges were on the higher side and has slightly reduced the same. The details of the proposed and approved charges are given in the schedule at the end of this Order.

#### **Recovery of Cost of Burnt Meter**

5.16 Commission directs the Board to recover the full depreciated cost of the burnt/damaged meter plus supervision charges, if burning of the meter is not due to the fault of the licensee's system.

### Shifting of Connection from one place to another

5.17 The Commission directs that the Board should levy supervision charges from the consumers since the procedure and the effort involved is similar to that of laying a new connection.

## **Supervision Charges**

- 5.18 These charges are levied for supervision by the Board of works carried out by the consumer or through authorized licensed contractor. The charge is based on a percentage of the cost of labour and material used. The Board has not proposed any revision in the existing charges.
- 5.19 The Commission directs that the licencee should provide a ready reckoner for the cost of materials and labour and the supervision charges should be calculated as a percentage of these costs. The supervision charge may differ depending upon the nature of the work- works executed on behalf of a consumer as a deposit work, contributory works for colony electrification, supply to HT/LT consumers, works executed for local bodies, etc. Details of the charges are provided in the schedule at the end of this Order.

## Hiring of Boards Plants and Equipment

5.20 These charges are levied when consumer requisitions hiring facilities of Board's plants and equipments. These are rental charges and are recovered as per the provisions of section 45 (3)(b) of the Electricity Act.

5.21 The Commission opines that even the existing charges are slightly on the higher side and has made slight reduction in the same. The Commission is aware of the difficulties being faced in conversion of existing LT connections having a connected load of more than 100 HP, to HT category owing to limitation of space for installation of transformer sub-station HT yard in their premises. The Board may, after ascertaining the factual conditions, permit use of already installed transformer s/s and associated equipments, on hire to such consumers for conversion of their LT connections to HT category, provided that the transformer sub station already installed is meant exclusively for such consumers being a long term permanent customers of the Board, a lower hire charge compared to the hire charges proposed for other categories be levied. The Commission hence approves hire charges for Boards plant and equipment to be as under.

Table 6: Charges for Hiring of Boards Plant and Equipment

Hiring of Boards plants and equipments						
	Existing	Proposed	Approved			
For initial pd .of hire agreement	current market price	current market price of	1.5% per months of current market price of equipments upto one year or less			
For subsequent pd .of hire agreement	current market cost	current market cost of	1.75% per month of current market cost of equipment beyond one year			
For long term existing LT consumers (with load of more than 100 HP requiring to be converted to HT category	Nil		1% per month of current market cost of equipments per month			

## **Power Block Charges**

- 5.22 The Board has proposed to levy these charges on the Railways in the reciprocal manner as the Railways charge the 'Railway Traffic Block' charges from the Board.
- 5.23 The Commission disallows the charges in lieu of the already high tariffs being charged from the Railways in comparison with their cost of supply for sale of power. Since these charges arise only in isolated cases, The Board may arrange maintenance work during that time period.

# **Compensation charges**

5.24 These charges are levied for detecting unauthorized use of power and mal practices and have been applicable since 1982. The Board proposes to revise the charges by 7 times the existing charges based on 700% increase in wages and 300% increase in transportation

**Table 7: Compensation Charges** 

Compensation Charges	Existing	Proposed	
Where power consumer uses L&F	Rs.50 (domestic), Rs.25 (commercial)	Rs.175	
power			
where CL is increased without submitting test report and supplementary agreement	5/HP of the extended load or Rs.50 whichever is more per month	35/HP or Rs.350 whichever is more per month	
Breaking of all body seals	Rs.50	Rs.350	
Energy Theft cases	100 for 1 ph 300 for 3 ph	700 for 1 ph 2100 for 3 ph	
Use of phase splitters in agriculture	300	700	

5.25 The Commission disallows the levying of Compensation Charges in view of the fact that there are stringent penalties laid down under section 126 and sections 135 to 142 of the Electricity Act 2003 now and therefore there is no justification for any other compensation charge to be levied under this head

### Fee payable for Dues Settlement Committee

5.26 These charges are disallowed by the Commission in view of the setting up of the Grievance Redressal Forums.

## **Security Deposit**

5.27 In pursuance of section 47 of the Electricity Act 2003 and also as per Clause 21 of the General Conditions of Supply for MP, the Board is allowed to collect Security Deposit from in consumers in respect of the electricity supplied to them or for any electric line or electric plant to be provided for supplying electricity to consumers. The objective is to protect the cash flow of the Board in case of delayed payment of bills. The Board has proposed no change in the existing deposits for LT(1.5 months of assessed consumption), Agriculture (of 3 months of assessed consumption) or HT consumers (1.5 months of assessed consumption The Commission has notified a regulation in this matter called the MPERC( Security Deposit )Regulations 2004, as on 22<sup>nd</sup> September 2004 (published in State gazette on 1.10.2004 )where these deposits are specified in the schedule at the end of this Order.

#### Fee for verification of Records of old dues

5.28 This is a nominal fee levied by the Board for verification and searching of records of old dues and issue of a certificate in a proper format. The Board has proposed fees for different consumer category which is stated below.

The Commission allows the fee under this head.

**Table 8: Charges for Verification of Old Dues** 

Fee for verification of record of old dues/records.							
(i) LT consumers	Existing	ing Proposed Approved					
(a) 1-Phase		and certified or 0.1% of dues	(a) Rs.25/- per year of records verified and certified or 0.1% of dues outstanding, whichever is more.				
(b) 3-Phase		and certified or 0.1% of dues	(b) Rs.50/- per year of records verified and certified or 0.1% of dues outstanding, whichever is more.				
(ii) HT consumers		verified and certified or 0.1% of dues	(ii) Rs. 500/- per year of records verified and certified or 0.1% of dues outstanding, whichever is more.				

## **Charges for maintenance of Streetlights**

- 5.29 These charges are proposed by the Board since it has to earmark and deploy resources to maintain, repair and replace the public streetlights. The proposed charges are based on increase in costs required in replacement, renewal of lamps, accessories which have to be recovered by the Board.
- 5.30 The Commission has taken no decision as a detailed hearing with municipalities and local bodies has not been possible. The Commission will pass a separate order after hearing the local bodies, Till then the Board must continue with existing arrangement.

**Table 9: Charges for Maintenance of Street Lights** 

	Existing as of March 99	Proposed	Approved
Fluorescent tube	Rs./month	Rs./month	Rs./month
(i) 1 tube of 40 watts	34	54	
(ii) 2 tube of 40 watts	67	107	
(iii) 3 tube of 40 watts	101	162	
(iv) 4 tube of 40 watts	134	214	
Mercury Vapour Lamps			Same as the existing arrangement
(I) 80 Watts	76	122	
(ii) 125 Watts	82	131	
(iii) 250 Watts	152	243	
(iv) 500 Watts	173	277	

#### Fee for Temporary Supply under Tatkal Yojana

- 5.31 This fee is proposed for giving temporary supply on notice of 24 hours under the Tatkal Yojana as per the provisions of the M.P. Electricity Supply Code (Chapter IV, Section (G) in 4.65 Clause). The scale of additional fee has been proposed in proportion to the connected load applied. The proposed fee is given as under.
- 5.32 The Commission opines that these charges as proposed by the Board are high and should not be levied for agricultural consumers. The approved charges for the same are as under

Table 10: Charges under Tatkal Yojana

Temporary Connections under Tatkal Yojana							
	Existing	Proposed	Approved				
Additional Fee for temporary supply under "Tatkal Yojana (except for agriculture consumers)			Rs.20/KW of connected load or part thereof, applied for				

## Cost of Requisition forms and Booklets

- 5.33 The Board levies a nominal charge from consumers towards requisitions forms and booklet.
- 5.34 The Commission disallows a charge being levied on Kanekshan ke liye Sambandhit Nirdesh avam Avden form and approves the following charges because the same is covered under the M.P. Electricity Supply Code.

Table 11: Cost of Requisition forms and booklets

Cost of Requisition forms and Booklets	Existing	Proposed	Approved
Application form for LT Consumers	Rs 5	Rs 5	Rs 5
Application form for HT Consumers	Rs 50	Rs 50	Rs. 25
Booklet for M.P.Electricity Supply Code	Rs 3	Rs 3	Rs 3
Booklet for tariff schedule	Nil	Nil	Rs.3

## Fee for special Meter Reading

5.35 This is a nominal fee levied by the Board for meter reading under specific circumstances viz (vacating premise, house being locked etc, name transfer). The Commission approves the charges proposed by the Board.

Table 12: Fee for special meter reading

	Existing	Proposed	Approved
(a) LT consumers	Nil	Rs. 25 per reading.	Rs. 15 per reading.
(b) HT consumers	Nil	Rs. 100 per reading.	Rs. 100 per reading.

### **Charges for Dedicated Feeder**

5.36 This charge is for providing a dedicated feeder and may include extension costs and supervision costs. The Commission directs the charges to be levied in the following manner given in the table

**Table 13: Charges for Dedicated Feeder** 

Charges for Dedicated feeder					
	Existing	Proposed	Approved		
When a consumer requests for a dedicated feeder	Nil		Cost of extension to be borne by consumer + 15% supervision charge + Maintenance charges to be paid to Board @ 1%/ month of the actual cost of extension (excluding supervision charges)		

# Service Charge for Dishonoured Cheque

5.37 Commission directs the Board to levy a processing fee on consumers whose payments through cheques have been dishonoured. The Commission directs this charge to be Rs.150/- per cheque or 1% of the amounting cheque dishonour and whichever is higher shall be levied.

## **Charges for Name Transfer of Service**

5.38 The Commission allows following fees for the procedure of name transfer of service. These charges are levied for effort required for changes in records and associated work for processing of application which the Board undertakes for this purpose.

Table 14: Charges for .Name Transfer of Service

Consumer Category	Approved Rates (Rs.)
LT Consumers	Rs.100
HT Consumers	Rs.2000

#### **A6: COMMISSION'S ORDER**

- 6.1 In exercise of the powers conferred on the Commission by section 45, 46, 47 and 50 of the Electricity Act, 2003, the Commission hereby notifies that the MPSEB petition on Miscellaneous and General Charges as placed before the Commission by the MPSEB are not accepted in full for the reasons mentioned in detail in the foregoing sections of this Order. The Commission further notifies MPSEB that the charges, as approved in the various sections of the Order above, be implemented.
- 6.2 This Order is signed, dated and issued by the Madhya Pradesh Electricity Regulatory Commission at Bhopal on this the 9th December, 2004.

Sd/- Sd/- Sd/
(R.Natarajan) (D.Roybardhan) (P.K.Mehrotra)

Member (Eco.) Member (Engg.) Chairman

# ANNEXURE I: SCHEDULE OF MISCELLANEOUS AND GENERAL CHARGES

## I. Meter Hire/Rental Charges

Particulars		Existing	Proposed	Approved	
		Rs/meter/month	Rs./meter/month	Rs./meter/month	
	HT Meters	2.3% cost of metering system	2.3% cost of metering system		
1	H.T. For 220 KV system meter alongwith CTs, PTs Cable etc.	32730	35236	22980	
2	For 132 KV System meter alongwith CTs, PTs Cable etc.	16120	17733	11565	
3	For 33 KV System meter, CTs, PTs meter box etc.	2040	2166	1415	
4	For 11 KV System meter, CTs, PTs meter box etc. The HT consumers existing	1540	1588	1035	
	LT Meters	2.3% cost of metering system	2.3% cost of metering system		
i)	Single phase energy meter without MCB	12	17	5	
ii)	Single phase meter with MCB	16	19	6	
iii)	Poly phase meter without M.C.B	25	28	12	
iv)	Poly phase meter with MCB.	36	36	14	
v)	Poly phase LT meter with CTs	45	118	50	
vi)	Demand or special type Meter	184/- or 2.3% of cost of metering system whichever is higher	184/- or 2.3% of cost of metering system whichever is higher	100	
	If consumer opts for paying for entire cost of the meter, then no hire charges will be levied; otherwise meter rentals as approved above				

# II. Other Miscellaneous and General Charges

		Existing	Proposed	Approved
1	Shifting of meter Board with meter within same premises	Rs./job	Rs./job	Rs./job
	(i)Changing of meter/meter Board position within same premises *	50	135	50
	(ii)Resealing of cut outs of the meter Board in the insumer's premises, if seal is found broken	13	55	15
	* No request for change of meter shall be entertained unless contested and unless s	such a challenge is	upheld	L
2	Replacement of Fuses/glass/meter cards			
	Replacing consumer's cut out fuses (LT)	20	20	20
	(ii) replacement of missing meter cards	Rs.10/card	Rs.10/card	Rs. 5/ card
	(iii) replacement of broken glass of single phase/ three phase meter	24	24	24
3	Disconnections/Reconnections **			
	(I) Up to 25 KW			
	(i)At overhead mains***	150	135	125
	(ii)At underground mains	400	520	500
	(II) Above 25 KW up to 75 KW (100 HP)			•
	(i)At overhead mains	Add 25% to above charges 3(1)	520	500
	At underground mains	Add 25% to above charges 3 (1) (ii)	520	500
	(III) Above 100 HP(75KW) upto 5 MVA		2350	1000
	(IV) Above 5 MVA upto 25 MVA	Add 50% to 3(1) (ii)	4000	1250
	(V) Above 25 MVA	3(1)(11)	6000	2000
	** Charges proposed to be recovered include charges for	r disconnectio	n as well as rec	onnection
	*** Charges at cut outs and overhead m	nains shall be t	the same	
	In case of broken meter glass, it shall be changed by utility after satisfying itself that no tampering has been done and the cost of damages shall be recovered from the consumer			

4	Re-sealing of meter MD indicators and instruments of the Board in The Consumer's premises if seal is found broken.	Existing	Proposed	Approved
	(B) For Three phase (Other than L&F) Connections :			
	(I) Industrial connections for loads upto 25 BHP (upto 10 HP in existing scale)	214	258	200
	(II) Connections above 25 BHP (without CTs) (above 10 HP in existing scale)	437	450	400
	(III) Connections above 25 BHP (with CT's or Special Type Meters)	437	800	550
5	Re-rating of installations where done on consumer request	Rs. per apparatus	Rs. per apparatus	Rs. per apparatus
5	S		-	-
5	request	apparatus	apparatus	apparatus
5	request (I) Single Phase Connections	apparatus 97	apparatus 105	apparatus 90

# III. Testing Charges for Consumers equipments at consumer request (Meters, CTs metering equipments)

S.	Particulars	Existing	Proposed	Approved		
No		Rs./job	Rs./job	Rs./job		
1	Single phase energy meter	50	215	50		
2	3 phase 3/4W energy meter without LT CT	75	530	75		
3	3 phase 3/4W energy meter with LT CT	1000		1000		
4	Special Meter bivector/trivector	1000	1065	1000		
5	LTCT	300	425	300		
6	33/11 KV Metering Equipments.	3000	4100	3000		
	# if consumer contests the accuracy of his equipment and if the contest is found to be correct, the above amount shall be refunded					

# V. Security Deposit

	Existing	Proposed	Approved
agriculture Pump)	assessed/average	Equivalent to 1.5 months assessed/average consumption	To be levied as provided
	assessed/average	Equivalent to 3 months assessed/average consumption	
	assessed/average	Equivalent to 1.5 months assessed/average consumption	
Seasonal			
Stone crushers, hot-mix plants			
Consumers unable to provide proof of legal occupation			

# VI. Charges for arranging supply

Particulars	Existing	Proposed	Approved Head	Approved
	infrastructure including 15% supervision charges	infrastructure including 15% supervision charges {11 KV lines, Distribution transformers, LT lines, augmentation of 33/11 KV S/s capacity and new 33/11 KV S/s (if required, or compulsory, when the load exceeds 2500 KW)} + Capacity Building	residential/ commercial complexes (a) Where work is done by the Board.	from distribution mains for arranging supply to be borne by the consumer

executed through an 'A'	system strengthening charges @ Rs. 2300 per KW.	on the entire cost of works for infrastructure development +	executed through an 'A' Class Electrical Contractor by the consumer	Supervision charge on the
unapproved colonies	Same as for legal colonies (work to be taken up only after atleast 75% of the plot holders deposit the requisite charges), but without levy of system strengthening charges.	proposed for legal colonies, without any relaxations.	same as (a) & (b) above	same as (a) & (b) above
Multi-storeyed buildings & Commercial Complexes.		Same as charges now proposed for legal colonies.	1 / 1 /	same as (a) & (b) above
3- Phase L.T. Connections (Other than flour mills in rural areas and agricultural pump connections) for connected load or C.D., as applicable			same as (a) & (b) above	same as (a) & (b) above
a) Upto 30 B.H.P		Entire cost of 11 KV lines, distribution transformers, L.T. Line extension beyond 30 metres and capacity building charges @ Rs. 625 per B.H.P or part thereof.	above	same as (a) & (b) above
		Entire cost of 11 KV lines, distribution transformers, L.T. Line extension beyond 30 metres and capacity building charges @ Rs. 832 per B.H.P or part thereof.		same as (a) & (b) above

# **VII. Service Connection Charges**

	Particulars	Existing	Proposed	Approved
In c	ase service line work executed by Board	<u> </u>		
I	LT Single Phase Connection for a length not exceeding 30 of whether it is on public or private property:-	meters from	he Board's Distribution	n mains, irrespective
	(a) For General Supply upto a load of 2 KW	Rs. 725	Rs. 1105	Rs. 750
	(b) For supply to motive power with connected load not exceeding one and half HP in the aggregate	Rs. 725	Rs. 1105	Rs. 750
	Extra charges for each additional metre of service line exceeding 30 meters plus actual cost of support(s) and stay(s), with foundation of entire length of service line where required in addition.	meter	Rs. 30 per meter.	Rs. 25 per meter.
II	LT 3 phase connection for a length not exceeding 30 met whether it is over public or private property:-	tres from the	Board's Distribution m	nains irrespective of
	(a) For supply to connected load not exceeding 5 KW.	Rs. 1600	Rs. 2200	Rs. 1500
	(b) for supply to connected load exceeding 5 KW but not exceeding 10 KW	Rs. 2300	Rs. 2740	Rs. 2000
	(c) For supply to connected load exceeding 10 KW.		As per actual but not less than Rs. 2,740	Rs. 125 for each additional Kilo Watt but not less than Rs. 2,500
	For each additional metre of Service line exceeding 30 meters plus actual cost of support(s) and stay(s), with foundation on entire length of service line, where required in addition.	meter	Rs. 51 per meter	Rs. 50 per meter
III	Charges for tapping the existing connection for giving a new beyond 6 metres from the existing meter point.	w single phase	e connection, if the new	service point is not
	(a) LT Single Phase General Supply upto a load of 2 KW	Rs. 350	Rs. 530	Rs. 350
	(b) Lt Single Phase motive power supply with connected load not exceeding 11/2 HP in aggregate	Rs. 350	Rs. 530	Rs. 350
IV	An extra charge towards the cost of earthing terminal provided by the Board in each service.	Rs. 10	Rs. 10	Rs. 10
<u>1</u>	In case service line work executed by consumer through licen <u>levied</u>	iced electrical	contractors, departme	ntal charges to be

	Particulars	Proposed Service connection charges (excluding supervision charges)	Proposed Departmental Charges (15% of service connection (S/C) charges)	Approved Departmental Charges
(I)	LT Single Phase Connection from the Board's distribution prope		f whether it is o	n public or private
	(a) For General supply upto A load of 2 KW.	Rs. 960	Rs. 144	Rs. 150
	(b) For supply to motive power with connected load not exceeding $1$ - $1/2$ in the aggregate	Rs. 960	Rs. 144	Rs. 150
II	LT 3 Phase Connection from the Board's Distribution ma	•	nether it is over	public or private
	prope		<b>r</b>	
	(a) for supply to connected load not exceeding 5 KW.	Rs. 1913	Rs. 287	Rs. 280
	(b) For supply to connected load exceeding 5 KW but not exceeding $10\ \mathrm{KW}.$	Rs. 2383	Rs. 357	Rs. 350
	(c ) For supply to connected load exceeding 10 KW upto 25 HP.			
	(i) For overhead supply			of S/C but not less
	For underground Supply			of S/C but not less
	(d) For supply to connected load exceeding 25 HP upto 100 HP.			
	For overhead supply			of S/C but not less
	For underground Supply			of S/C but not less
III	Charges for tapping the existing connection for giving a ne beyond 6 meters from the			service point is not
	•		1	D 70
				Rs. 70
	LT Single phase motive power supply with connected d not exceeding 1-1/2 HP in aggregate.	Rs. 461	Rs. 68	Rs. 70

# VIII. Cost of Requisition forms and booklets

	Existing	Proposed	Approved
Application form for LT Consumers	Rs 5	Rs 5	Rs 5
Application form for HT Consumers	Rs 50	Rs 50	Rs. 25
Booklet for M.P.Electricity Supply Code	Rs 3	Rs 3	Rs 3
Booklet for Tariff Schedule	Nil	Nil	Rs.3

## IX. Recovery of Cost of Burnt Meter

Existing	Proposed	Approved
supervision charge-10%	Full Cost + store incidental charges+ 15% supervision charge-10% cost of meter	

## X. Shifting of Connection from one premises to another

	Existing	Proposed	Approved
Agriculture	No charge	Nil if State govt. reimburses the Board	Supervision charges procedure similar to new connections
Other categories	actual cost or 15%supervision	actual cost or 15%supervision	Supervision charges procedure
			similar to new connections

## XI. Supervision charges

	Particulars	Existing	Proposed	Approved
1	Contributory works viz. colony electrification supply to HT/LT consumers			15% of cost of estimate of the work.
2	Electrification work of Industrial area developed by MPAKVN.			
	(a) If land for requisite substation provided by MPAKVN at Commercial rates.		15% of the cost of estimate of the work.	15% of the cost of estimate of the work.

	(b) If land for requisite substation is provided by MPAKVN/ Industrial deptt. at	estimate of the work.		10% of the cost of estimate of the work.
	the same rate as being			
	provided to the new industries			
	coming up in industrial area			
3	Works executed by the Board		24% of the cost of estimate	
	on behalf of a consumer as a	estimate of the work.	of the work.	estimate of the work.
	deposit work.			
4	Works executed by the Board		12.5% of the cost of estimate	12.5% of the cost of
	on behalf of a railway on	estimate of the work.	of the work.	estimate of the work.
	reciprocal basis.			
5	Work executed by the Board	10% of the cost of free	10% of the cost of free	10% of the cost of free
	for free length of line	length of line.	length of line.	length of line.
6	Work executed by the Board	7% of the cost of estimate	7% of the cost of estimate of	7% of the cost of
	from MP/MLA funds.	of the work.	the work.	estimate of the work.
7	Works of shifting of	5% of the total estimated	5% of the total estimated	5% of the total estimated
	poles/lines requisitioned by	cost of the works.	cost of the works.	cost of the works.
	Nagar Nigams/Palikas and			
	other local bodies.			

# XII. Hiring of Boards plants and equipments

	Existing	Proposed	Approved
agreement	market price of	market price of	1.5% per months of current market price of equipments upto one year or less.
		market cost of equipments	1.75% per month of current market cost of equipments beyond one year.
For long term consumers with load of more than 100hp requiring to be converted to HT category		reimburses the Board	1% per month of the current market cost of the equipment

## XV. Fee for verification of record of old dues/records

	Existing	Proposed	Approved
(i) LT consumers			
1-Phase	Nil	verified and certified or 0.1% of dues	(a) Rs.25/- per year of records verified and certified or 0.1% of dues outstanding, whichever is more.
3-Phase	Nil	verified and certified or 0.1% of dues	(b) Rs.50/- per year of records verified and certified or 0.1% of dues outstanding, whichever is more.
(ii) HT consumers	Nil	verified and certified or 0.1% of dues	(ii) Rs. 500/- per year of records verified and certified or 0.1% of dues outstanding, whichever is more.

# XVI. Fee for special meter reading

	Existing	Proposed	Approved
(a) LT consumers	Nil	Rs. 25 per reading.	Rs. 15 per reading.
(b) HT consumers	Nil	Rs. 100 per reading.	Rs. 100 per reading.

## XVII. Charges for maintenance of street lights

	Existing as of March 99	Proposed	Approved
Fluorescent tube	Rs./month	Rs./month	Rs./month
(i) 1 tube of 40 watts	34	54	
(ii) 2 tube of 40 watts	67	107	
(iii) 3 tube of 40 watts	101	162	Same as the existing
(iv) 4 tube of 40 watts	134	214	arrangement
Mercury Vapour Lamps			
(I) 80 Watts	76	122	
(ii) 125 Watts	82	131	
(iii) 250 Watts	152	243	
(iv) 500 Watts	173	277	

## XVIII. Charges for Dedicated feeder

	Existing	Proposed	Approved
When a consumer requests for a dedicated feeder	Nil		Cost of extension to be borne by consumer + 15% supervision charges + Maintenance charges to be paid to Board @ 1%/ month of the actual cost of extension (excluding supervision charges)

## XIX. Temporary Connections under Tatkal Yojana

	Existing	Proposed	Approved
Additional Fee for temporary supply under "Tatkal Yojana (except for agriculture consumers)		Rs.50/KW of connected load or part thereof, applied for	Rs.20/KW of connected load or part thereof, applied for

# XX. Service Charge for Dishonoured Cheque

	Existing	Proposed	Approved
Service Charge for Dishonoured Cheque for all consumer category	Nil		Rs.150 or 1% of the amounting cheque dishonour and whichever is higher shall be levied.

# XXI. Charges for Name Transfer of Service

Consumer Category	Existing	Proposed	Approved (Rs.)
LT Consumers	Nil	Nil	100
HT Consumers	Nil	Nil	2000

# ANNEXURE II: LIST OF OBJECTORS

S.No.	Name & Address			
1	Dr.P.G.Najpande, Chairman, Nagrik Upbhokta Margdarshak Manch, 6/47, Ramnagar, Adhartal, Jabalpur			
2	Shri P.L.Nene, President, M.P. Electricity Consumers Society, C/o AIMO, MPSB, Industrial Estate, Pologround, Indore.			
3	Shri B.L.Jain, 482, Sahu Mohalla, Jabalpur-482002			
4	Shri Krishnadas, Gram Titgaon, Tehsil Burhanpur (M.P.)			
5	Shri Shreeram, Gram Dapora, Tehsil Burhanpur (M.P.)			
6	Shri Vasant, Gram Dapora, Tehsil Burhanpur (M.P.)			
7	Shri Pandurang, Gram Loni, Tehsil Burhanpur (M.P.)			
8	Shri Raghunath Patil, Gram Dapora, Tehsil Burhanpur (M.P.)			
9	Shri P.L.Nene, M.P. Cement manufacturer's Association, 162, Maharana Pratap nagar, Zone- II, Bhopal.			
10	Shri Rajnikant Pandya, 53, Tilak Marg, Kila Road, Shajapur, Malwa (M.P.)			
11	Chatra Sangram Parishad, katni			
12	Shri D.D.Jatav, C-645, Shahpura, Bhopal			
13	Shri Jagdish Prasad Gupta, Imli Stand, Kilchipur, Rajgarh(M.P.)			
14	Shri Ambaram Mukati, Member, State Advisory Committee			
15	Shri Krishnan, National Centre for Human Settlement and Environment (present in the public hearing)			
16	Shri Agarwal (present in the public hearing)			
17	Shri Jain (present in the public hearing)			