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> APPEAL PETITION No. P/061/2017 (Present: A.S. Dasappan) Dated: 28<sup>th</sup> September 2017

Appellant	:	Sri. Chacko Varghese, Managing Director, Filatex VCT Pvt. Ltd., Thread Links, Kochuveli, Thiruvananthapuram.
Respondent	:	The Assistant Executive Engineer, Electrical Sub Division, KSE Board Ltd, Beach, Chakkai, Pettah P.O., Thiruvananthapuram

#### <u>ORDER</u>

#### **Background of the case:**

The appellant is a consumer of electricity in LTIV tariff under the Beach Electrical Section Office of the KSEBL at Thiruvananthapuram with consumer number 10279. The Complaint is against the short assessment demand dated 18-08-2010 issued by the Assistant Engineer for an amount of Rs. 98,481/towards arrears of electricity charges for the period 6/2004 to 10/2004 on the basis of a Audit report of the Regional Audit Officer. Challenging the above demand dated 18-08-2010, the appellant submitted a complaint CC No 276 of 2010 before the District Consumer Disputes Redressal Forum, Thiruvananthapuram which was dismissed as per Order dated 01-11-2016 as not maintainable before that Forum without prejudice to file it before proper Forum for adjudication.. So the appellant had approached the Hon'ble CGRF Kottarakkara by filing a petition in OP No. 275/2016. The Forum quashed the short assessment bill for Rs. 98,481/- and directed the respondent to revise the bill from 07/2004 to 10/2004 on the basis of 3 months average

consumption from 11/2004 to 01/2005. Aggrieved against this, the appellant has submitted this appeal petition before this Authority.

## Arguments of the appellant:

1) The appellant consumer having consumer No 10279 in LTIV tariff in Beach Section office Thiruvananthapuram submitted a complaint before the CGRF Kottarakkara against the illegal and arbitrary demand of Rs. 98,481/-towards short assessment bill dated 18-08-2010 for the period 6/2004 to 10/2004.

2) The electrical connection was granted by the licensee to the consumer under LT IV industrial tariff. Challenging the above demand dated 18-08-2010, the consumer submitted a complaint CC No 276 of 2010 before the District Consumer Disputes Redressal forum, Thiruvananthapuram which was dismissed as per Order dated 01-11-2016 as not maintainable before that Forum without prejudice to file it before proper Forum for adjudication. Consequently a complaint was filed before the CGRF, Kottarakkara.

3) It is submitted that the short assessment demand for Rs. 98,481/- was raised by the Assistant Engineer, Electrical Section, Beach, Thiruvananthapuram on 18-08-2010 on the basis of an audit report No. RAO/AAO-D/BCH2010-20H/48 dated 30-07-2010 of the Regional Audit officer, Thiruvananthapuram (Urban).

4) According to the above report, Consumer No 10729, Connected load 102 kW IT IV with CT meter Power consumption from Dec 2003 to June 2004 is as follows:

Dec 2003	17360			
Jan 2004	10680			
Feb 2004	16280			
Mar 2004	21560			
Apr 2004	16560			
May 2004	12680			
Jun 2004	10360			
7/2004	meter burnt.			
7/2004 to $9/2004$ average 10360 units charged.				
Meter changed on $11/9/2004$ .				
After meter change, consumption reads as follows				
11/2004	14660			
12/2004	15520			
01/2005	14120			
02/2005	17840			

The average consumption charged from 6/2004 to 9/2004 is not correct. Average consumption should have been computed for 6 months prior to 6/2004.Consumption for 6/2004 may be treated as sluggish. Average consumption from 12/2003 to 5/2004 is 15853 units. Based on that average, the assessment of Energy charges from 6/2004 to 9/2004 is to be revised as follows.

Total units = 15853 X 4 = 63412 units. Units already charged =  $10360 \times 4 = 41440$  units Balance units from 6/2004 to 9/2004 = 63412-41440 = 21972 units. Meter changed on 11/9/2004. Initial reading on meter.. 2 Reading as on 10/2004(20 days).... 298 Per day consumption 298-2 = 296/20 units Consumption for 30 days (10/2004)= 296/20 X 30 = 444X 40(Multiplication factor) = 17760 units. Actually charged in 10/2004= 11840 units Balance units for 10/2004 = 17760 -11840 units = 5920 units Total short units = 21972+5920 = 27892 units. Energy charges = 27892 x Rs. 3.25 per unit = Rs. 90649.00 Dutv Rs. 7832.00 Total Rs. 98481.00

5) Based on the above report dated 30-07-2010, the Assistant Engineer issued demand dated 18-8-2010 demanding payment of Rs. 98481.00 on or before 08-09-2010. On request dated 26-8-2010 made by the appellant, the Assistant Engineer forwarded the letter No BCH/BB/AUD1T/10-H/28-08-10 dated 28-08-2010 including the calculation details along with copy of audit report. Immediately the appellant approached the CDRF Thiruvananthapuram and the demand was under stay till 1-11-2016.

6) It is respectfully submitted that the demand for Rs. 98,481.00 mentioned above is not legally sustainable. Cause of action behind the above demand occurred in July 2004 when the electricity meter in the consumer premises was burnt or became faulty. The meter was replaced by a new meter on 11-09-2004. Admittedly monthly bills-demands were made during the above period and those demands were paid by the appellant then and there within the permitted time limit. Thereafter the Board authorities waited for long six years up to 18-08-2010 to make revised demands during the above period from 6/2004 to 10/2004. Law is with the vigilant and the Board authorities were sleeping for six years and in 2010 they cannot revise the original demands as if the law of limitation has no application to them.

7) The Board can collect any amount from the consumer only if that is permitted by law. Civil suit cannot be filed after three years of cause of action

claiming money. Regulation 37(5) of the Terms and Conditions of supply was not in force at that time.

8) A new legislation by name Electricity Act 2003 was enacted by the Central Government and the same was implemented in Kerala from 10-12-2003. Therefore as on the date of cause of action in this case namely July 2004, Electricity Act 2003 was in force in Kerala. Section 56(2) of the above Act clearly bars the above demand made after six years from the relevant period in respect of which demands were already raised and paid. According to the above Section, no sum due from any consumer under this section shall be recoverable after the period of two years from the date when such sum became first due unless such sum has been shown continuously as recoverable as arrear of charges for electricity supplied and the licensee shall not cut off the supply of the electricity.

9) Here demands for the relevant periods were already issued and the appellant has remitted the same. The new demand came in the form of a review or modification of the earlier demand and for that reason the law of limitation under Section 56(2) of the Electricity Act cuts at the root of the demand and the same is liable to be set aside for that sole reason.

10) The meter was faulty from 7/2004 to 11-09-2004. Here charges are revised for 6/2004 to 10/2004 in 2010 which is not a legally competent act.

11) The case was pending before the CDRF, Thiruvananthapuram from 2010 to 2016 and the same was dismissed as not maintainable before that Forum on the ground that the connection is given for commercial purpose. The Forum has also observed that Regulation 37(5) of the Terms and Conditions of Supply of Electricity enables the Board to recover the amounts undercharged by issuing the bills. It is respectfully submitted that Reg.2 of the Terms and Conditions of Supply clearly says that the Terms and Conditions of supply shall apply to all consumers under the Board. The word "shall" means it has only prospective operation and therefore it has no application for a cause of action in 2004. The judgment in Southern India Marine Products Vs KSEB 1995 (2) KLT 167 is of the year 1995, when Electricity Act, 2003 or its Section 56(2) were not even formulated by the legislature and hence there was no occasion for that judgment to consider the validity of Section 56(2) of Electricity Act 2003.

12) The contention that a revised demand in respect of a demand already issued and paid can be raised at any point of time is not supported by Section 56(2) of the Electricity Act. "Date of due" mentioned in Section 56(2) of the Act cannot be interpreted in such a way that the Board can revise and issue a bill at any point of time as if the law of limitation is not applicable to them. If that be so, every consumer will have to wait for a revision of any bill at any point of

time. Date of due contention can be raised only when no previous bill was issued for the relevant period.

13, The Case filed before the CGRF Kottarakkara was finally heard on that the bills for the relevant period from 6/2004 to 10/2004 were already issued in 2004 and the consumer has remitted the same. The later short assessment demand dated 08-08-2010, after six years of original bills can be considered only as a revision or review of those original bills and that in view of the clear wordings in Section 126 of the Electricity Act 2003, the short assessment is barred by limitation and is not maintainable. This is specifically stated in Para 4 of the CGRF order.

14, But the Forum has stated that during the relevant period, the Conditions of Supply of Electricity was in force and that clause 31(C) is applicable and Section 56(2) of the Electricity Act 2003 is not applicable. It is respectfully submitted that there is no dispute regarding the fact that Electricity Act 2003 came into force in Kerala on 10-12-2003 and that as on the relevant period from 6/2004 to 8/2004, the same was in force. Therefore even assuming that clause 31(C) of the Conditions of Supply was applicable, any revision of the bills already issued during the relevant period under clause 31(C) could be made only for a period of two years from the relevant period in 2004. When Section 56(2) of Electricity Act 2003 operates, a revised demand could be issued only up to 2006 and not thereafter. Here the review short assessment demand is issued for the first time in 2010 and for that reason the short assessment demand cannot stand scrutiny of law. However the CGRF quashed the demand for Rs. 98,481/- and directed the Engineer to revise the bill from 7/2004 to 10/2004 on the basis of three months average consumption from 11/2004 to 1/2005. Consumer is seriously aggrieved by the second limb of the above order in so far as it has directed to revise the bill from 7/2004 to 10/2004 on the basis of three months average consumption from 11/2004 to 1/2005 and hence this representation.

Nature of the order sought:

It is humbly requested that the Ombudsman may be pleased to set aside the Order dated 18-05-2017 in OP No 275/2016 issued by the CGRF Kottarakkara in so far as it has directed the respondent Assistant Engineer, Electrical Section, Beach Thiruvananthapuram to revise the bill of consumer No 10729 from 7/2004 to 10/2004 on the basis of three months average consumption from 11/2004 to 1/2005 and to allow this petition.

### Arguments of the respondent:

All the averments in the petition except those that are specifically admitted here under are denied.

1. The Petition is not maintainable either in law or in facts.

2. The Petition is false, frivolous and vexatious.

3. The appellant's establishment is provided with electrical connection bearing consumer No. 10729 under LT IV Industrial tariff. A short assessment bill for Rs. 98,481/- was served to the appellant dated 18-08-2010 on the basis of RAO's audit report No. RAO/AAo-D/BCH2010- 2011/48 dated 30-07-2010 of The Regional Audit Officer, Thiruvananthapuram. According to the above report the short assessment amount was arrived as follows:

The power meter of the consumer was burnt during 07/2004. New meter was installed on 11-09-2004.

As per clause 33(2) of the Kerala State Electricity Board Terms and Conditions of Supply 2005, if an energy meter becomes non recording or malfunctioning and the Board is unable to raise a bill on meter reading, the Board shall issue a bill on the previous six months average consumption. Hence an average reading of previous six months from 12/2003 to 05/2004 was taken, as the meter was sluggish from 06/2004 onwards and the meter was burnt during 07/2004. The consumption from 12/2003 to 05/2004are as follows:

12-2003	17360 units
01/2004	10680 units
02-2004	16280 units
03-2004	21560 units
04-2004	16560 units
05-2004	<u>12680 units</u>
Total	95120 units

Average consumption = 95120 = 15853 units.

Instead of issuing bill for 15853 units during the meter faulty period from 06/2004 to 09/2004, the bill issued was only for 10360 units. Apart from this bill, the bill issued during 10/2004 was also wrong. New meter was installed on 11.09.2004. Instead of issuing bill for 17760 units for 10/2004, the bill issued was for 11840 units. 17760 units is arrived as per the calculation given below:

(<u>296X3Q</u>=444X 40MF) =17760 units. 20 Thus the short assessment bill was issued for the meter faulty period from 06/2004 to 09/2004 and also claiming the balance amount due in the bill for the period during 10/2004 due to error kept in the said bill. The details as follows:

The actual units to be charged during the meter faulty period (from 06/2004 to 09/2004	15853 X 4	= 63412 units
Less units already charged	10360 X 4	= 41440 units
Balance		= 21972 units
Short assessment for 10/2004	=17760-11840	= 5920 units
Total Short assessment	= 21972 + 5920	= 27892 units
Short assessment current charge	= 27892 X Rs.3.25	= Rs.90649/-
Duty		= Rs. 7832/-
Total Short assessed Amount	= Rs. 90649 + Rs. 7832	= Rs. 98481/-

The bill issued to the consumer is for the short assessment made in the normal rate for the tariff applicable. The KSEBL is empowered by clause No. 37(5) of the Kerala State Electricity Board Terms & Conditions of Supply, 2005 and read with Regulation 24(5) of the Electricity Supply Code, 2005, to recover from the consumer, the amounts under charged by issuing the bills. Hence the bill is sent to the consumer is as per Rules and there is no deficiency in service on the part of KSEBL.

Complaint was filed by the appellant with the District Consumer Redressal Forum, Thiruvananthapuram dated 04-09-2010 and the demand was under stay till 01-11-2016. The same was dismissed by the forum vide order dated 18-07-2016, after clearly stating the merits of the respondent side and with a view that, the complaint is not maintainable before the forum and without prejudice to file it before proper forum for adjudication.

The Hon'ble CDRF has well clearly pointed out the following facts in the above order:

1. The forum has convinced of the fact that, the connection was taken for running a commercial establishment under LT IV Industrial Tariff, while cross questioning them. Forum has no jurisdiction to entertain the complaint, since the commercial purpose will not come under the purview of Consumer Protection Act and hence the Hon'ble CDRF has dismissed the above complaint before the forum as it is not maintainable before the forum.

2. The Board has charged-the consumer as short assessment made in normal rate of tariff applicable and not charged any interest for the amount

and declining the right of the Board to realize the actual current charge would affect the very existence of the organization.

3. The KSEBL is empowered by clause No. 37(5) of the KSEB Terms & Conditions of Supply 2005 and read with Regulation 24(5) of the Electricity Supply Code 2005, to recover from the consumer, the amounts under charged by issuing the bills. Hence the short assessment bill issued to the consumer is in order and there is no deficiency in service on the part of KSEBL.

4. The short assessment bill dated 18.08.2010 is not barred by limitation as alleged by the appellant that, Board can revise and issue a bill at any point of time. Section 56(2) of Electricity Act is not applicable since it is settled position that the limitation period will run from the date of demand. The current charge will become due only when the demand is made. This was made clear by the Hon'ble High Court in Southern India Marine Products V/s. KSEB (1995(2) KI, 1(167). The bill was raised only on 18-08-2010 and hence the cause of action will start to run only from 18-08-2010. Thus there is no limitation in issuing the bill. Hence the appellant has no cause of action and no relief are allowable.

1. The appellant has argued that Board cannot revise a bill already issued after a period of six years and Regulation 37(5) of the Terms & Conditions of Supply was not in force at that time.

2 It is humbly replied that, KSEBL is empowered by Regulation 37, Disputes in bill, clause 5 that if the Board establishes that it has undercharged the consumer either by review or otherwise, the Board may recover the amount undercharged from the consumer by issuing a bill and in such cases at least 30 days shall be given for the consumer to make payment against the bill. It is no where mentioned, the time period for establishing the fact of being undercharged the consumer. Only on 30-07-2010, an anomaly has been detected in the bill already issued to the consumer, that the electricity charges are undercharged and consequent to the same, a short assessment bill dated 18-08-2010 has been served to the consumer. Please note that Board has only charged the consumer a short assessment made in normal rate of tariff applicable and not charged any interest for the amount and declining the right of the Board to realize the actual current charge would affect the very existence of the organization. Hence the short assessment bill issued to the consumer is in order and there is no deficiency in service on the part of KSEBL.

3. The appellant has also argued that the date of cause of action is July 2004 and as per the relevant rules in force at that time, bars the demand made after six years from the relevant period in respect of which demands were already raised and paid.

4. Here it may please be noted that, the cause of action is in the year 2010, when an anomaly was detected. The short assessment bill dated 18.08.2010 is not barred by limitation as alleged by the appellant that Board can revise and issue a bill at any point of time. Section 56(2) of Electricity Act is not applicable since it is settled position that the limitation period will run from the date of demand. The current charge will become due only when the demand is made.

5. Regulation 56, Disconnection of supply in default of payment, clause (2) of Electricity Act, 2003 says that, notwithstanding anything contained in any other law for the time being in force, no sum due from any consumer, under this section shall be recoverable after the period of two years from the date when such sum became first due unless such sum has been shown continuously as recoverable as arrear of charges for electricity supplied and the licensee shall not cut off the supply.

6. The short assessment bill (without any interest) was raised only on 18-08-2010 and hence the cause of action will start to run only from 18-08-2010. Thus there is no limitation in issuing the bill. Hence the appellant has no cause of action and no relief are allowable. Hon'ble CGRF in its order dated 22-05-17 in Para 5, has made it clear that, Section 56(2) of Electricity Act is not applicable in this case. It is ordered by Hon'ble CGRF that, short assessment bill for Rs. 98,481/- is quashed and directed the respondent to revise the bill from 7/2004 to 10/2004 on the basis of three months average consumption from 11/2004 to 1/2005. In the context, 1 request the Hon'ble CGRF order dated 22.5.17 and to remit the short assessment bill revised accordingly.

# Analysis and findings:

The Hearing of the case was conducted on 25-08-2017, in the Court hall of CGRF, Kottarakkara and Mr. Jose J. Matheikel, advocate represented the appellant's side and Smt. Sreekala B. Nair, Assistant Executive Engineer, Electrical Sub Division, Beach, Thiruvananthapuram represented the respondent's side.

On perusing the Appeal Petition, the counter of the Respondent, the documents submitted, arguments during the hearing and considering the facts and circumstances of the case, this Authority comes to the following findings and conclusions leading to the decisions there of.

The appellant has raised the following main issue.

1) As per Sec. 56(2) of Electricity Act, 2003, the short assessment bill issued will not sustain. According to the appellant, the intention of Section 56(2) of the

Electricity Act is to prevent lethargy on the part of the licensees in issuing proper bills in time and that provision cannot be made redundant by misinterpreting it in a manner not intended by the Legislature.

The main contention of the Appellant is based on the Limitation of the bills, under Sec. 56(2) of Electricity Act, 2003, which reads "The licensee shall not recover any arrears after a period of two years from the date when such sum become first 'due' unless such sum has been shown continuously in the bill as recoverable as arrears of the charges of electricity supplied". This 'due date' is an important date for both consumer and KSEB (Licensee). This is because after a period of two years from the 'due date', the arrear bills are time barred and the consumer is not liable to pay the sum even if it is a legitimate claim otherwise. Therefore it is a boon to the consumer and a loss to the Licensee. For an upright and bonafide consumer, he need not worry of 'Bills' of long pending dues after a period of 2 years, if it is not shown continuously in the regular bills of the consumer. On the other hand, in the case of Licensee he should be more vigilant and smart in preferring the bills in time, otherwise he has to suffer the loss for the laxities and omissions occurred on his part.

Since this issue has been dealt with, analyzed and given a firm opinion by the Upper Courts of Law/Jurists, we may follow the same. As such, I have before me the Judgment in the Petition filed, before the Hon: High Court, Bombay, vide No: 3784/2007, which has dealt the 'due date' issue in detail and pronounced its considered opinion. In this, it was spelt by Hon: Judge as follows;

In construing the expression "due" the interpretation that is to be placed must be harmonized so as to be applicable both in the context of Sub section (1)& (2) of Section 56. A sum cannot be said to be due from the consumer unless a bill for the electricity charges is served upon the consumer. Any other construction would give rise to a rather anomalous or absurd result that a disconnection of supply would be contemplated even without the service of bill. Though the liability of consumer arises or is occasioned by the consumption of electricity, the payment falls due only upon the service of a bill. Thus for the purpose of sub section (1) & (2) of section 56, a sum can be regarded as due from the consumer only after a bill on account of the electricity charges is served upon him'.

Thus the period of two years as mentioned in Sec. 56 (2) of Electricity Act 2003, would run from the date when such a Bill is raised by the Board and have become due for payment only after that demand has been raised. In the same Case it was further clarified by Hon: High Court that;

"Amount of charges would become due and payable only with the submission of the bill and not earlier. Word 'due' in this context must mean due and payable after a valid bill has been sent to the consumer", (Brihatmumbai Municipal Corporation Vs Yatish Sharma etc-2007 KHC 3784:2007.

In this case, the bill is seen raised in 10/2009 and has become due thereafter and time period of two years start from 10/2009 only and hence the appellant's argument is not maintainable under the bar of limitation. Further, it is the electricity charge, for the unrecorded portions of the energy actually used by the consumer when the meter was faulty and the consumer was being billed at an arbitrary value of previous average. As per the Agreement executed by the consumer with KSEB, the consumer is bound to pay the charges for the true electricity he has consumed. As the bill was issued in 08-10-2009 only, I am of the view that the two years limitation prescribed under Sec 56(2) is not attracted in this case".

The KSEB has reassessed the consumer, during meter faulty period, as per the provision of Regulation 33 (2) of the Terms and Conditions of Supply, 2005. Regulation 33 (2) reads; "If the Board is unable to raise a bill on meter reading due to its non-recording or malfunctioning, the Board shall issue bill based on the previous six months average consumption. In such cases the meter shall be replaced within one month. If the average consumption for the previous six months cannot be taken due to the meter ceasing to record the consumption or any other reason, the consumption will be determined based on the meter reading in the succeeding three months after replacement of the meter."

The Regulation 33(2) deals with, when the meter is not displaying (blurred) or the meter is not recording (still) or is malfunctioning (higher or lower than the actual) and hence the consumption is not available for preferring the correct bill and hence the consumer is assessed on an assumed average consumption.

Moreover the respondent also failed to reassess the party after obtaining the true average energy consumption, after changing the faulty meter with a good one in 09/2004. The respondent has failed to reassess the consumer as per the true average energy consumption obtained, even after getting the subsequent meter readings on replacing the damaged meter. The respondent's total laxity or omission in this regard is seen to be inexcusable. The faulty meter was replaced only in 09/2004. Even after changing the faulty meter and having obtained the energy consumption particulars, the Board did not prefer its due claim. It was the audit party who noticed the discrepancy and suggested the reassessment for meter faulty time, after a period of six years. As per Reg.33 (2) of KSEB T & C of Supply 2005, the assessment for the meter faulty period shall be made on the basis of the average consumption in the succeeding 3 months after replacement of the meter, if the previous 6 months average is not available or trustworthy.

It is true that the KSEB shall supply electricity only through a correct meter, but the mechanism may get corrupt due to many reasons and may take some time, say 2 or 3 readings when there is gradual decrease in consumption rate, to test and decide the condition of the meter. In this case, the respondent has averred that the meter was sluggish during the month of 06/2004 without testing the meter. This is only an assumption based on decrease in consumption and hence not acceptable. Hence it was proper to take previous six months consumption including consumption for 05/2004 for fixing the average consumption as per Section 56 (1) (b) of Electricity Act, 2003.

## **Decision**

From the analysis done and the Findings and conclusions arrived at, I take the following decisions.

The respondent has failed to replace the faulty meter for quite some months and even after its replacement in 09/04 and getting the true average consumption, failed to reassess the consumer subsequently. In the case of assessment done for the Industrial unit, pertaining to the period of 06/2004 to 11-09-2004, it is seen that the consumer was being billed with an average energy consumption of 10360 units per month. Later, after changing the faulty meter, the average energy consumption was obtained as 15853 units per month, as per Reg. 33(2) of T & C of supply. Accordingly the respondent has raised a bill for the meter faulty period of 06/2004 to 09/2004, with the difference of 27892 units.

It is decided that the total assessment done for the disputed meter faulty period from 01-06-2004 to 11-09-2004 by the Respondent, has to be revised taking the average of previous six months consumption as 14687 units instead 15853 units and the actual consumption in the new meter for the remaining days of 09/2004. The respondent is directed to revise the bill as decided above and shall issue to the consumer with thirty days time (due date) given for making the payment. The consumer is also eligible for installments, if requested for, and the respondent may allow the same. No interest is payable by the consumer up to the due date of the revised bill as ordered now. But the consumer needs to pay the applicable interest for the installments.

Having concluded and decided as above, it is ordered accordingly. The order dated 18-05-2017 of CGRF (SR) in OP No. 275/2016 is set aside. No order on costs.

## **ELECTRICITY OMBUDSMAN**

P/061/2017/ /Dated:

Delivered to:

- 1. Sri. Chacko Varghese, Managing Director, Filatex VCT Pvt. Ltd., Thread Links, Kochuveli, Thiruvananthapuram
- 2. The Assistant Executive Engineer, Electrical Sub Division, KSE Board Ltd, Beach, Chakkai, Pettah P.O., Thiruvananthapuram

Copy to:

- 1. The Secretary, Kerala State Electricity Regulatory Commission, KPFC Bhavanam, Vellayambalam, Thiruvananthapuram-10.
- 2. The Secretary, KSE Board Limited, Vydhyuthibhavanam, Pattom, Thiruvananthapuram-4.
- 3. The Chairperson, Consumer Grievance Redressal Forum, Vydhyuthibhavanam, KSE Board Ltd, Kottarakkara 691 506.