# CENTRAL ELECTRICITY REGULATORY COMMISSION NEW DELHI

Coram: Shri V.S.Verma, Member Shri M.Deena Dayalan, Member

Petition No. 176/SM/2012

Date of Hearing: 16.05.2013 Date of Order : 10.07.2013

## In the matter of

Non-compliance of the Commission's directions and the provisions of the Electricity Act, 2003 and Central Electricity Regulatory Commission (Indian Electricity Grid Code) Regulations, 2010

#### And

#### In the matter of

- 1. Shri Avneesh Awasthi, Former Managing Director, Uttar Pradesh Transmission Corporation Ltd., Lucknow
- 2. Shri Satish Chandra, Chief Engineer, State Load Despatch Center, Lucknow

...Respondents

# Following were present (on 25.9.2012):

- 1. Shri Suraj Prakash Singh, Advocate for Respondent No.1
- 2. Shri Rahul Srivastava, Advocate for Respondent No. 2
- 3. Shri V.V. Sharma, NRLDC
- 4. Shri Rajiv Porwal, NRLDC
- 5. Ms Joyti Prasad, POSOCO
- 6. Shri Rajiv Gupta, PTCUL
- 7. Shri Satish Chandra, UP SLDC
- 8. Shri R.K. Gupta, UP SLDC
- 9. Shri M.K. Gupta, UP SLDC

## **ORDER**

The Commission vide order dated 17.8.2012 in Petition No.125/MP/2012 had observed as under:

- "20 We had indicated in our order dated 10.7.2012 that it would be the personal liability of the officers in charge of the STUs and SLDCs to ensure compliance with our directions to curtail overdrawal from the grid and comply with the messages of NRLDC. During the hearing, the officers of UPPTCL, PTCUL, HVPNL, RRVPNL and PSTCL have not denied overdrawal from the grid or non-compliance with the directions of the RLDCs. The officer in charge of PDD, Jammu and Kashmir did not appear despite notice. We deprecate the attitude of the concerned officer towards the order of the Commission in the serious matter like grid discipline. We are of the view that these officers have not only failed to comply with our directions but have also failed to discharge their responsibility under the Act and the Grid Code. We direct the staff of the Commission to process the case for initiation of action under Section 142 of the Act against the officers in charge of STUs/SLDCs of the States of Uttar Pradesh, Uttarakhand, Haryana, Rajasthan, Punjab and Jammu and Kashmir for imposition of penalty for non-compliance with our directions and the provisions of the Act and the Grid Code."
- 2. The Commission in order dated 5.9.2012 issued the following directions:
  - "5. We are of the view that SLDC is under a statutory obligation to comply with the Grid Code specified by the Commission and ensure compliance with the directions of NRLDC. Since STU is operating the SLDC in the State, it also becomes the responsibility of the Officer in-charge of the STU to ensure that the SLDC discharges its functions and comply with the orders of NRLDC and the Commission. Therefore, the respondents, who were in charge of STU and SLDC at the time of issue of direction of the Commission, have failed to discharge their responsibility under the Electricity Act, 2003 and Grid Code.
  - 6. In view of the above, the respondents are directed to show cause by 17.9.2012, as to why penalty should not be imposed on them under Section 142 of the Electricity Act, 2003 and the penalty amount should not be recovered from their salary for contravention of the provisions of the Act, Grid Code, directions of NRLDC and orders of the Commission."
- 3. In response to show cause notice dated 5.9.2012, the Respondent Nos. 1 & 2 have filed their replies vide affidavits dated 20.9.2012 & 15.9.2012.

- 4. Shri Awanish Awasthi, former Managing Director of Uttar Pradesh Transmission Corporation Limited, Respondent No.1 herein, has submitted as under:
  - (a) The main reason for overdrawal during the period from May 2012 to July 2012 is that there was a huge difference in demand and availability which increased during the summer season, with average requirement reaching 9500 MW. Out of the 9500 MW requirement, the UPPTCL was assured of 8500 MW from its own generation, bilateral arrangement and from Central generating stations. However, the situation became worse on or after 1.5.2012 due to sudden increase of demand and outage of generation units of Central generating stations and State generating station for various reasons like shortage of coal, maintenance of machines etc. which resulted in a heavy shortfall of about 2000 MW of UP generation and 500 MW of Central generation.
  - (b) As against the average requirement of 11000 MW in the month of May and June 2012, availability has been reduced to 7000 MW which resulted in severe power shortage and overdrawal in the period in question. The Respondent has placed on record a chart showing the shut down/outage during the month of May and June 2012. It has been submitted that there was loss of generation due in Lanco (Anpara C) due to coal shortage, Vishnuprayag Unit due to high silt level apart from reduction in supply from Central sector from 105.8 MU to 95.3 MU.

- (c) For meeting the excess demand of power, the corporation has been arranged power through power exchange, but sometimes power could not be availed due to mismatch of quoted prices and clearing prices of exchange. To maintain the grid discipline and to avoid the situation of overdrawal in the months of May, June and July 2012 they have imposed extreme emergency rostering in the entire major towns in the U.P. to provide timely support to the grid and immediately reduced the supply hours of various categories of consumers.
- (d) Even though UP had made arrangement for bilateral purchase of power from different sources from the month of May to July 2012, but due to shortage of coal the requisitioned amount of power did not materialize. Due to extreme rise in temperature, the average demand of electricity rose sharply during May and June 2012.
- (e) UP SLDC has its own microwave communication system to convey the messages, however, such connectivity is limited to sub-stations of 220 kV and thereafter the messages are conveyed to 132 kV sub-stations by telephone which takes time and as a result, the messages received from NRLDC could not give the desired result in required time frame.
- (g) In compliance to the directions of the Commission and NRLDC, the Corporation has installed under frequency relays at 48.8 Hz (Stage 1) and 48.6 Hz (Stage 2)

for isolation of 190 MW and 240 MW load respectively. Since during the period in question, frequency has not touched the 48.8 Hz most of the times, the under frequency relays have not been operated and whenever the frequency has touched the 48.8 Hz, the effects given by under frequency relays in each stage was sufficient.

- (h) Vide notification dated 25.5.2012, the State Election Commission had notified the schedule of the Election of the Municipal Corporation, Nagar Palika and Nagar Panchayat from 27.5.2012 to 7.7.2012. The month of Ramzaan started from 20.7.2012 and to maintain the religious peace, rostering had to be curtailed for few hours in the entire State and in view of the aforesaid schedule of the Election, certain areas had to be exempted from rostering/load shedding. Hence, vide letter dated 30.5.2012 the State Government was asked for the financial assistance of ₹ 480 crore for purchase of the power considering the schedule of election and for avoiding the overdrawal. In response to this, the State Government in the month of June had given ₹ 200 crore as a loan to the Corporation against the demand of ₹ 1480 crore from which power could be arranged only for few days.
- (i) On account of prolonged shut down, the staff of the Corporation had to face the wrath of the angry mob. Letters have been written by the District Magistrates and Commissioners of the Districts to the Corporation regarding the bad law and order situation due to shortage of power.

- 5. Respondent No.1 has submitted that there is no willful intention on his part to contravene the provisions of the Act or rules or regulations or directions of the Commission. It has been submitted that overdrawal could not be contained due to the situation beyond the control of the respondent and therefore, the proceedings against the respondent be dropped.
- 6. Shri Satish Chandra, Chief Engineer, UP State load Desptch Centre, Respondent No.2 in his affidavit dated 15.9.2012 and Supplementary Affidavit dated 24.9.2012 has submitted as under:
  - (a) Under the Conduct Rules, it is the duty of any officer to obey the orders passed by the higher authorities. During the period in question, the respondent had to grant exemption to certain towns and feeders in compliance with the orders passed by the Chairman & Managing Director of UPPCL due to law and order situation. As a result, the advance schedule prepared by the respondent could not be followed.
  - (b) The State Government in its notification dated 24.1.2011 while notifying the "Power System Unit" as the "State Load Despatch Centre" provided that the SLDC would operate under the Uttar Pradesh Power Transmission Corporation Ltd." The respondent has relied upon the order dated 31.3.2009 in Adjudication Case No.1 wherein the Commission dropped the proceedings against the then Chief Engineer (Power System) on the ground that SLDC was not established in the State. Even though SLDC in the State has now been established, the respondent as Chief Engineer (Power System) does not have any independent power and is always

bound by the orders passed by the higher authorities viz. the State Government, Chairman of UPPTCL, MD of UPPTCL and Director (Operation) of UPPTCL. During the period, the Chairman/Managing Director of UPPCL was also holding the post of the Managing Director of UPPTCL and therefore, the Respondent No.2 was bound to comply with the directions of CMD of UPPCL/UPPTCL.

(c) On receipt of the letter dated 15.5.2012 from NRLDC requesting for corrective action to avoid overdrawal, CMD of UPPCL/UPPTCL sought the comments of Respondent No.2. In response, Respondent No.2 had submitted the proposal to start the closed unit of Harduagani, Anpara, Rosa and Lanco on preferential basis in order to increase the availability by 1000-1200 MW and to purchase power through bilateral agreement and power exchange. Alternatively, Respondent No.2 is stated to have sought permission for imposing power rostering for maximum of 12 hours in the villages and tehsils and for imposing schedules of 15 hours, 17 hours and 19 hours in category of HV-2, Mandals and Mahanagars respectively. The proposal of Respondent No.2 was neither accepted nor Respondent No.2 was allowed to apply the suggested schedules. Respondent No.2 submitted a fresh schedule of supply hours for different categories of consumers on 23.5.2012 for curtailment of overdrawal. CMD UPPCL/UPPTCL apprised the situation to the State Government on 24.5.2012 and sought financial assistance of ₹1000 crore for managing the demand of electricity upto 15.7.2012. However, the State Government did not accord approval to the above proposal.

- (d) On 5/6.7.2012, a joint three member committee consisting of the Chief Engineer (Power System), Member (SPAT) UPPCL and Chief Engineer (PPA) UPPCL recommended to the MD UPPCL/UPTCL that either financial assistance be provided for purchase of power or the supply schedule for different categories of consumers be revised accordingly. After receiving the recommendations, MD UPPCL/UPPTCL directed that electricity supply from all sources should be restricted to 225 MU.
- 7. In view of the above explanation, Respondent No.2 has submitted that the quantum of power to be drawn from the grid is being decided by the MD of UPPCL/UPPTCL and not the Chief Engineer (Power System). Respondent No.2 has submitted that he has exercised all due diligence and taken all possible steps within his control to avoid the situation of overdrawal. Respondent No.2 has also tendered unconditional apology for unintentional contravention of the provisions of the Act or the order issued by the Commission.
- 8. During the course of hearing on 25.9.2012, learned counsel for Respondent No. 1 submitted that all possible steps are being taken to curtail the overdrawal from the grid. Learned counsel appearing for Respondent No.2 submitted that Respondent No.2 has exercised due diligence to comply with the directions of this Commission and NRLDC.

However, overdrawal has taken place due to reasons beyond the control of Respondent No.2.

- 9. We have heard the respondents and perused the documents on record. We proceed to deal with the extent of non-compliance by the respondents with the provisions of the Act, Grid Code, directions of NRLDC and directions of this Commission.
- 10. From the written pleadings and oral submissions of the respondents, it has emerged that the respondents have not denied overdrawal from the grid, but have sought to justify the overdrawal for various reasons such as outage of the Central and State generation on account of shortage of coal and maintenance of machines, sudden rise in demand, notification of the election of the Municipal Corporation and onset of the month of Ramdan, shortage of funds for purchase of power, non-vailability of microwave link for communication below 220 kV level for sending messages, law and order situations, etc. Respondent No.2 has submitted that as a Government servant, he is bound by the Conduct Rules and has to carry out the orders of the senior officers. Since directions were given by the senior officers in writing not to carry out the load shedding, the Respondent No.2 had no other option but to carry out the directions. In our view, the reasons given by respondents do not justify continued overdrawal from the grid. The respondents are well aware that overdrawal from the grid leads to load generation

imbalance and continued overdrawal by all or most constituents of the region has the portent to result in grid disturbance or grid failure.

- 11. The Respondent No.2 has argued that SLDC is not independent in the State of UP and has been placed under UPPTCL and for all operational matters it has to take instructions from MD, UPPTCL. Respondent No.2 after receiving the letter from NRLDC had taken the steps and suggested rostering and load shedding which was not approved and given effect to by MD UPPTCL. Respondent No.2 submitted a fresh schedule on 25.5.2012 to MD UPPTCL. Instead of approving it, MD UPPTCL sought financial assistance of ₹ 1000 core from the State Government. Subsequently, on 5/6.7.2012, a joint three member committee consisting of the Chief Engineer (Power System), Member (SPAT) UPPCL and Chief Engineer (PPA) UPPCL recommended to the MD UPPCL/UPTCL that either financial assistance be provided for purchase of power or the supply schedule for different categories of consumers be revised accordingly. After receiving the recommendations, MD UPPCL/UPPTCL is stated to have directed that electricity supply from all sources should be restricted to 225 MUs. Respondent No.2 has argued that it has taken all possible steps within its power to restrict overdrawal from the grid to the schedule but for the reasons beyond his control, overdrawal could not be contained.
- 12. The main contention of the Respondent No.2 is that even though Power System Unit has been notified as the SLDC in UP, it is not independent as it is functioning under

UPPTCL. Therefore, Respondent No.2 has to abide by the directions of Respondent

No.1 while discharging its functions. Section 31 of the Act provides for creation of State

Load Despatch Centre. Section 31 of the Act is extracted as under:

"31. (1) The State Government shall establish a Centre to be known as the State Load Despatch

Centre for the purposes of exercising the powers and discharging the functions under this Part.

(2) The State Load Despatch Centre shall be operated by a Government company or any authority or corporation established or constituted by or under any State Act, as may be notified by the State

Government.

Provided that until a Government company or any authority or corporation is notified by the State

Government, the State Transmission Utility shall operate the State Load Despatch Centre:

Provided further that no State Load Despatch Centre shall engage in the business of trading in

electricity."

Thus section 31 enjoins upon the State Government to establish a State Load Despatch

Centre for the purpose of exercising the powers and discharging the functions under the

Act. It further provides that a Government Company or any authority or a corporation

established by or under any State Act shall operate the SLDC and until such

notification, the State Transmission Utility shall perform the functions of SLDC. The

State Government of UP has issued the following notification in respect of UP SLDC:

"Notification

No.78/24-U.N.N.P- 11-525/08

Lucknow: dated 24 January, 2011

In exercise of the powers under Section 31 of the Electricity Act, 2003 (Act on 36 of 2003) the Governor is pleased to establish the "power system unit" situated at 5th floor, Shakti Bhawan, Lucknow as the State Load Despatch Centre for the purposes of

exercising the powers and discharging the functions under part v of the said Act, with

immediate effect.

The said Centre shall be operated under the Uttar Pradesh Power Transmission Corporation Limited notified as the State Transmission Utility in Government notification

no. 122/U.N.N.P/24-07 dated July 18, 2007 unless notified otherwise by the State

Government."

It is seen from the above that the Power System Unit has been established as SLDC. It is not clear whether the Power System Unit is a Government Company or an authority or corporation established under the State Act. It has been further provided that the SLDC shall function under UPPTCL until otherwise notified by the State Government. It appears to us that the State Transmission Utility, i.e. UPPTCL is operating the SLDC in UP and the Chief Engineer in charge of SLDC has no functional independence and is discharging his functions according to the directions of MD, UPPTCL. It has been submitted by Respondent No.2 that at least on two occasions, he has submitted the schedules for rostering and load shedding to MD, UPPTCL but no action was taken. But the recommendations of the committee (in which Respondent No.2 was a member) for purchase of additional power to meet the demand or alternatively for rostering submitted on 5.7.2012 was accepted by MD UPPTCL who directed to limit the drawal schedule to 225 MUs. Respondent No.2 has submitted that it is the MD, UPPTCL who takes final decisions and not the Chief Engineer (SLDC) in the matter of reducing the overdrawal from the grid. In our view, though the SLDC functions should be vested in a separate company or corporation or authority to ensure independence and impartiality, the Act provides for the STU to discharge the functions till such an arrangement is made. In that case, STU will be responsible for discharging the functions of SLDC as envisaged in the Act. Though Respondent No.2 is accountable to Respondent No.1 and has to comply with the directions of Respondent No.1, we have to consider whether Respondent No.2 has discharged his responsibility diligently in the matter of grid operation and compliance with the directions of NRLDC.

- 13. Under the scheme of the Act, SLDC has been made responsible for ensuring integrated operation of the grid within the State. In this regard, section 32 is extracted as under:
  - "32. (1) The State Load Despatch Centre shall be the apex body to ensure integrated operation of the power system in a State.
  - (2) The State Load Despatch Centre shall -
  - (a) be responsible for optimum scheduling and despatch of electricity within a State, in accordance with the contracts entered into with the licensees or the generating companies operating in that State;
  - (b) monitor grid operations;
  - (c) keep accounts of the quantity of electricity transmitted through the State grid;
  - (d) exercise supervision and control over the intra-state transmission system; and
  - (e) be responsible for carrying out real time operations for grid control and despatch of electricity within the State through secure and economic operation of the State grid in accordance with the Grid Standards and the State Grid Code."

It is apparent from the above that SLDC is the apex body for integrated operation of the power system in the State. SLDC has also been vested with the powers under section 33 of the Act to issue appropriate directions to the generating companies, licensees and other persons concerned with the power system operation in the State. The said section is extracted as under:

- 33. (1) The State Load Despatch Centre in a State may give such directions and exercise such supervision and control as may be required for ensuring the integrated grid operations and for achieving the maximum economy and efficiency in the operation of power system in that State.
- (2) Every licensee, generating company, generating station, sub-station and any other person connected with the operation of the power system shall comply with the direction issued by the State Load Depatch Centre under sub-section (1).
- (3) The State Load Despatch Centre shall comply with the directions of the Regional Load Despatch Centre.

(4) If any dispute arises with reference to the quality of electricity or safe, secure and integrated operation of the State grid or in relation to any direction given under subsection (1), it shall be referred to the State Commission for decision:

Provided that pending the decision of the State Commission, the directions of the State Load Despatch Centre shall be complied with by the licensee or generating company.

(5) If any licensee, generating company or any other person fails to comply with the directions issued under sub-section (1), he shall be liable to penalty not exceeding rupees five lacs."

In our view, SLDC is sufficiently empowered under the Act to take decisions. Even where the SLDC is functioning under the supervision and control of the State Transmission Utility, it is the responsibility of the STU to ensure that the statutory provisions of the Act with regard to the functions of SLDC are complied with. One of the functions of SLDC is to ensure that the directions of RLDC are complied with. Section 29(3) of the 2003 Act is extracted hereunder in this connection:

- "(3) All directions issued by the Regional Load Despatch Centres to any transmission licensee of State transmission lines or any other licensee of the State or generating company (other than those connected to inter State transmission system) or sub-station in the State shall be issued through the State Load Despatch Centre and the State Load Despatch Centres shall ensure that such directions are duly complied with the licensee or generating company or sub-station."
- 14. In our order dated 10.7.2012, we had directed the officers in charge of STU and SLDC of the constituent States of Northern Region to comply with the following:
  - (a) The respondents shall not resort to any overdrawal from the NEW grid when the frequency is below 49.5 Hz and shall comply with the Grid Code.

- (b) The respondent shall ensure that directions of NRLDC issued under section 29 of the Act are faithfully complied with and compliance of these directions reported to NRLDC.
- (c) The respondents shall ensure that the UFR and the feeders used for load shedding through UFRs are different from the feeders used for manual load shedding so that security of the grid is not compromised
- (d) The respondent shall submit compliance of Regulations 5.4.2(d) and Regulation 6.4.8 of the Grid Code as per the Commission's directions contained in the order dated 15.12.2009.
- 15. As regards ensuring nil overdrawal from the grid at frequency below 49.5 Hz, it is noted that during the period from 10.7.2012 to 16.7.2012 (i.e. after issue of our order dated 10.7.2012), the overdrawal of UP was of the following order:

Date	Overdrawal
	(MU)
10.7.2012	15.53
11.7.2012	26.13
12.7.2012	31.78
13.7.2012	21.16
14.7.2012	24.48
15.7.2012	27.10
16.7.2012	36.33
Average	20.67

Respondents have given explanations such as high demand, municipal elections and law and order situation, etc. for the overdrawal. The respondents have not indicated

any concrete steps such as load shedding, issuing directions to distribution companies and opening of feeders etc which were taken by them during the period to contain the overdrawal.

16. As regards compliance with the directions of NRLDC, we find from the submission of NRLDC filed on 23.7.2012 that UP was issued 12 'A' messages, 15 'B' messages and 4 'C' messages during the period 10.7.2012 to 16.7.2012 which have been taken note of in our order dated 30.7.2012. It is noted that on 16.7.2012, the frequency remained below 49.5 Hz for 29.10% of the time and even touched the first stage of UFR i.e. 48.8 Hz at around 2200 hrs. UP was overdrawing 1226 MW at 2155 hrs when the frequency was 49.68 Hz and 2562 MW at 2230 hrs when the frequency was 48.99 Hz. This clearly indicates that UP was not complying with the directions given in our order dated 10.7.2012. However, the steps taken to ensure compliance with the directions of NRLDC by SLDC and the distribution companies including the load relief achieved have not been indicated. It has been merely stated that the microwave system of communication exists upto 220 kV sub-stations and messages are conveyed to 132 kV sub-stations through telephone. In our view, SLDC being apex body and responsible for real time operation in the State, should have well defined plan to restrict the load in case of low frequency conditions. Under such a state of affairs, it will not be required to pass messages of NRLDC to all 132 kV sub-stations. Instead clear instructions must be available with the concerned agencies to cut the load on preplanned and selected substations. The SLDC should have a proper load management scheme rather than routinely conveying the messages to all 132 kV sub-stations through the conventional methods as a result of which real time grid operation becomes difficult.

- 17. As regards the separation of the feeders used for load shedding through UFRs from the feeders used for manual load shedding, the respondents have stated that as per the directions of this Commission and NRLDC, UFRs have been installed at 48.8 Hz (Stage 1) and 48.6 Hz (Stage 2) for isolation of 190 MW and 240 MW load respectively. However, no information has been provided with regard to the separation of the feeders used for load shedding through UFRs from the feeders used for manual load shedding.
- 18. The last direction was regarding submission of compliance of Regulations 5.4.2(d) and Regulation 6.4.8 of the Grid Code as per the Commission's directions contained in the order dated 15.12.2009. Regulation 5.4.2 (prior to the Second Amendment) and Regulation 6.4.8 of the Grid Code provide as under:

## "5.4.2 Demand Disconnection

- (a) SLDCs/SEB/Distribution Licensee and bulk consumer shall initiate action to restrict the drawal of its control area, from the grid, within the net drawal schedule whenever the system frequency falls to 49.7 Hz.
- (b) SLDCs/SEB/Distribution Licensee and bulk consumer shall ensure that the requisite load shedding is carried out in its control area so that there is no overdrawal when frequency is 49.5 Hz or below.
- (d) The SLDC through respective State Electricity Board/Distribution Licensees shall also formulate and implement state-of-the-art demand management schemes for

automatic demand management like rotational load shedding, demand response (which may include lower tariff for interruptible loads) etc. before 01.01.2011, to reduce overdrawal in order to comply para 5.4.2(a) and (b). A report detailing the scheme and periodic reports on progress of implementation of the schemes shall be sent to the Central Commission by the concerned SLDC."

6.4.8. "The SLDCs/STUs/Distribution Licensees shall regularly carry out the necessary exercises regarding short-term demand estimation for their respective States/area, to enable them to plan in advance as to how they would meet their consumers' load without overdrawing from the grid."

These measures are required to be implemented by SLDC through the distribution companies of the State. The Respondents have not submitted any details about the action taken in this regard.

19. From the above, we have come to the conclusion, that Respondent No.1 has not complied with the directions in our order dated 10.7.2012 in Petition No.125/SM/2012. Though Respondent No. 2 functions under Respondent No.1, there is nothing on record to show that after issue of our directions dated 10.7.2012, Respondent No.2 has submitted any concrete proposal to Respondent No.1 for ensuring nil overdrawal from the grid in compliance with directions of NRLDC, to ensure separation of feeders and demand management by distribution companies. In our view, there are no mitigating factors which exonerate Respondent No.1 from the charges initiated under section 142 of the Act. Though Respondent No.2 had initiated certain proposals before 10.7.2012 but no proposal has been initiated or any concrete step taken pursuant to our order dated 10.7.2012 which resulted in overdrawal as extracted in para 15 above and issue

of messages as mentioned in para 16 above. In our view, the charges against the Respondent No.2 are partially proved. Accordingly, we impose a penalty of rupees one lakh on the Respondent No.1 and rupees fifty thousand on Respondent No.2 for non-compliance with the provisions of Act, Grid Code and directions of the Commission and NRLDC. The respondents are directed to deposit the penalty within one month from the date of issue of this order.

20. Petition No. 176/SM/2012 is disposed with above directions.

sd/-(M Deena Dayalan) Member sd/-(V S Verma) Member