
BEFORE THE KARNATAKA ELECTRICITY REGULATORY COMMISSION, BENGALURU

Dated : 26th February 2015

Sri M.R. Sreenivasa Murthy	Chairman
Sri H.D. Arun Kumar	Member
Sri D.B. Manival Raju	Member

O P No.13 / 2014

BETWEEN:

Karnataka Power Transmission Corporation Limited,
Cauvery Bhavan,
BENGALURU- 560 009. .. Petitioner
(Represented by Just Law, Advocates)

AND

Nil .. Respondent

In the matter of collection of O & M Expenses from IPPs and HT/EHT Consumers

- 1) The Karnataka Power Transmission Corporation Limited (KPTCL) has filed this Petition under Sections 86 and 94 of the Electricity Act, 2003, praying for the following reliefs :
 - (i) To allow the Petitioner to recover the O&M expenses incurred in maintaining the HT/EHT lines and terminal bays at the Petitioner's premises from the HT/EHT consumers and IPPs as proposed; and
 - (ii) To pass such other orders as deemed fit in the circumstances of the case, in the interest of justice and equity.

- 2) The following grounds are urged by the Petitioner :
- (a) The Independent Power Producers (IPPs), who have commissioned their own evacuation lines prior to the year 2005, have entered into Power Purchase Agreements (PPAs) with the Electricity Supply Companies (ESCOMs), which mandate that the evacuation lines have to be maintained by the Petitioner. In respect of the lines commissioned after the year 2005, the PPAs, mandate that the evacuation lines shall be maintained by the IPPs.
 - (b) As per Clause 8.01 of the Conditions of Supply of Electricity of Distribution Licensees in the State of Karnataka(CoS), the HT and EHT consumers are required to put up at their own cost, infrastructure, like Service Lines with associated terminal bays, for availing power supply from the grid and as per Clause 4.5 of the said CoS, notwithstanding that the cost of such infrastructure has been met by the HT/EHT consumers, the Service Lines shall remain the property of the Petitioner for the purpose of maintenance, and the Petitioner has the right to use it to supply power to any other prospective consumers, provided such use is not detrimental to such consumer or consumers already connected to such Service Line. Although this is the provision provided in the CoS, in reality, the consumer, who has invested money for putting up the Service Line, would oppose any move by the Petitioner to allow other consumers to get connected to the Service Line, which would mean that the Petitioner has to maintain the Service Line which is exclusively being used by such HT/EHT consumer.
 - (c) The Petitioner, therefore, feels it necessary to collect the O&M charges from such exclusive consumers. The Petitioner also submits that the terminal bay of the evacuation line or the exclusive HT/EHT Service line, which is placed in the Petitioner's premises, is being maintained by

the Petitioner, since unauthorized persons are prohibited from entering the premises, as per the definition of '*Prohibited Place*' under Section (2)(8) of the Official Secrets Act, 1923.

(d) Thus, in both the cases of either supplying power to the grid or using power from the grid, the IPPs and HT/EHT consumers are required to put up terminal bays in the Petitioner's premises, and such terminal bays are being maintained by the Petitioner and the expenses on such maintenance are being borne by the Petitioner. The O&M expenses are primarily incurred by the Petitioner for the exclusive use of the line / terminal bays by the IPPs and the HT/EHT consumers, which are commercial entities. Hence, they are required to bear the O&M expenses instead of making all the other consumers share such expenses. Therefore, the Petitioner proposes to recover these expenses at the rate of 1.5% per annum of the cost of Capital Cost of the terminal bay, equipment or the line or both, with an annual escalation of 12%.

(e) The Power Grid Corporation of India Limited (PGCIL), a Central utility, also levies charges on the Petitioner for the maintenance of the terminal bays owned by the Petitioner, placed in the premises of PGCIL, in terms of an agreement entered into with the Petitioner.

(f) If the costs incurred by the Petitioner towards maintaining the terminal bays and HT/EHT lines are borne by the HT/EHT consumers/IPP, the same will not be factored while computing the Petitioner's tariff. This will result in reducing the tariff to the other users of the grid.

3) The Commission directed the Petitioner to submit the details of the number of Terminal Bays and the details of the Transmission Lines in respect of the IPPs and HT/EHT consumers. The Petitioner submitted these details to the

Commission on 25.09.2014 and the details of the expenses have been furnished on 17.10.2014.

- 4) Since the Petitioner had not arrayed any of the IPPs or HT/EHT consumers as Respondents in this Petition, the Commission decided to hear the affected parties in a public hearing scheduled on 04.12.2014. The Petitioner was also directed to issue serve notices of hearing to all the aggrieved parties. Accordingly, the Petitioner had issued notice of hearing to the affected parties. A public hearing notice was also issued.
- 5) The Commission held a public hearing on 04.12.2014 in the matter. As a large number of objectors took part in the public hearing, and requested for further time to respond, the hearing could not be concluded on the same day. The hearing was adjourned to 08.01.2015 and the Commission permitted the concerned to make oral and written submissions in the hearing to be continued on 08.01.2015. Thus, the public were again heard on 08.01.2015. Many of the objectors have submitted written objections on the proposal. A list of persons who have filed written response and the participants who participated in the public hearing is annexed to this Order.
- 6) The following major points were put forth by the participants in the public hearing:
 - (a) The Petition is filed under the provision of Section 86 of the Electricity Act, 2003, without specifically indicating the sub-section under which it is filed. It is not clear as to whether it is filed for dispute resolution, or for determination of tariff. The Petition does not mention the names of the Respondents and therefore, many generators and EHT consumers have no knowledge about the Petition filed.

- (b) The Petitioner has not entered into any agreement with HT/EHT consumers and IPPs. Thus, the Petitioner has no contractual arrangement with the generators and consumers. In such a situation, no dispute arises under Section 86 of the Act, for violation of the terms of any agreement, and hence the Petition is not maintainable. The Electricity Act, 2003, does not provide for adjudication of disputes between consumers and the transmission licensee, and between inter-State open access consumers and the licensees.
- (c) The Petitioner has not furnished the details of equipment being maintained and the quantum of annual fee to be paid by the HT/EHT consumers and IPPs. The transmission charges cover all the expenses incurred by the Petitioner and hence no separate levy is warranted.
- (d) The Petitioner has filed the Petition in its capacity as STU and not as a Transmission Licensee. The functions and duties of STU are defined in Sections 39 and 40 of the Electricity Act, 2003, which do not empower it to collect any charges from HT/EHT consumers and IPPs. The relief is sought against consumers and an STU cannot maintain such a dispute before the Commission.
- (e) The Petitioner has started demanding and collecting the O&M charges from the generators and EHT consumers, even before filing this Petition for levy of such charges.
- (f) The HT and EHT consumers have entered into power supply agreements with the ESCOMs, and as per such agreements, they are paying tariff, which also include transmission charges. The transmission charges are derived from Expected Revenue from charges and includes the O&M cost.
- (g) The IPPs have either entered into PPAs with the ESCOMs or are availing open access facility for sale of power. The ESCOMs are

directing the IPPs to connect their power supply lines to sub-stations of STU, for facilitating them to draw the power to the required Load Centres. The ESCOMs are paying transmission charges to the Petitioner for evacuation of power, which includes the O&M charges. There is no necessity for the IPPs to pay such charges to the Petitioner.

(h) Commission has framed Regulations for Recovery of charges from the ESCOMs from the electricity consumers as per the provisions of Section 46 of the Electricity Act, 2003. There is no Regulation which permits recovery of any charge from the electricity consumers of the ESCOMs, by a transmission utility. The contention of the Petitioner that it is paying such charges to CTU (PGCI) in pursuance of an agreement and hence, on the same lines, IPPs and HT/EHT consumers have to pay such charges to it, is not correct, as there is an agreement and understanding between the Petitioner and PGCIL. The Petitioner cannot collect any charges from the IPPs or HT/EHT consumers, in the absence of any agreement between them to that effect .

(i) The evacuation transmission lines and bays in the sub-stations have been constructed at the cost borne by the HT/EHT consumers and IPPs, and later on handed over to the Petitioner for maintenance. The infrastructure so created becomes the property of the Petitioner, and collection of O&M charges individually is not proper. The O&M charges incurred by the transmission utility are being paid by ESCOMs as part of transmission charges. Hence, there is no provision for collecting any annual O&M cost by the Petitioner from the HT/EHT consumers and IPPs.

(j) The HT and EHT consumers are sharing the O&M charges not only at a higher voltage, but also at lower voltage LT lines, though they are not

using the same. Hence, they should be compensated for it, rather than imposing the additional burden.

- (k) The captive generators are not IPPs and hence should be exempted from payment of O&M charges.
- (l) The Petitioner has taken over the transmission lines and they have become the Petitioner's property. The O & M Charges payable by the IPPs to the transmission licensee is not factored while determining the tariff payable to generators. The proposed charges at 1.5% of the capital cost with escalation at 12% per annum would exceed the cost approved by the Commission in its tariff and hence would be a burden on the generators.
- (m) Some old generating companies have submitted that the evacuation line was constructed in 1996-97, at their cost by paying supervision charges, and handed over to the Petitioner for maintenance, as per the order of the Government. As per the Wheeling and Banking Agreement (W&BA) entered in the year 1993, maintenance was the obligation of the Petitioner and the W&BA is still in force. They have also stated that they have been permitted to install 110 kV towers in their land and are sparing their men and machinery as and when required for routine and breakdown maintenance of transmission line and bays. Hence, the old generating units, should be exempted from paying such charges.
- (n) The EHT consumers have submitted that they have high contract demand and are supplied power at 66/11 kV and thereby incurring additional expenditure on maintaining the 66/11 kV receiving station, besides maintaining the 11 kV and 440 Volts Service Lines.

- (o) The Wind Mill generators, whose wind mills were commissioned between 2006 and 2010, have submitted that they are getting a very low return on the energy generated and hence have requested to exempt them from payment of the O&M charges.
- 7) The Petitioner has filed rejoinder to the objections filed by the participants. A gist of the same, which are relevant to the case, is as under:
- (a) If the non-joinder of parties, being raised by the objectors, is accepted as correct, it would lead to absurd consequence and it would mean that, in every tariff determination exercise, all the consumers of the ESCOMs and the Petitioner would have to be made parties and personally served before undertaking the tariff determination. Such a process is neither warranted by the Electricity Act, nor is it feasible or practical. In the circumstances, it is stated that the frivolous contention on the maintainability of the Petition on the basis of non-joinder of parties is liable to be rejected. It is further stated that the Petitioner in its capacity as a STU can seek recovery of charges for maintaining its transmission network with a view to collect the O&M expenses directly from the large entities, without passing it on to the other grid users.
- (b) On the point that, in the absence of any agreement, the Petitioner is not entitled to collect the O&M charges from the IPPs and HT/EHT consumers, the Petitioner has submitted that that it incurs expenditure on maintenance of HT and EHT lines and that the same is being collected from the ESCOMs in the form of transmission charges. The direct collection of such expenditure from a section of large grid users, who are

basically commercial entities, has been thought of, to reduce the burden on the other grid users.

- (c) On the point raised by the objector that there are no Regulations which provide for collection of O&M charges from IPPs and HT/EHT consumers, it is submitted that there is no bar on the Commission dealing with any matter or exercising any power under the Electricity Act, for which no Regulations have been framed, and the Commission may deal with such matters, in a manner as it thinks fit. The Commission is empowered to determine the manner of collection of O&M charges in terms of Section 39(1)(d) of the Electricity Act, 2003.
- (d) The Petitioner has also brought to the notice of the Commission that the evacuation lines and the service lines with its associated terminal bays constructed by the IPPs and HT/EHT consumers are not accounted for in the total length of the line and terminal bays in the transmission system of the Petitioner and hence collection of O&M charges separately from IPPs, HT and EHT consumer will not amount to double collection.
- (e) On the objections filed by the generators and HT/EHT consumers against collection of the O&M charges, it is stated by the Petitioner that the generators are expected to build and maintain the bays and transmission lines, and the cost of maintaining these bays and line is not being included by it in the ARR being approved by the Commission.
- 8) We have perused the records and heard the learned counsel for the Petitioner and the stakeholders. In the light of the above contentions, the following points would arise for consideration of this Commission :
- (a) Whether the Petition is maintainable?

- (b) Whether the Petitioner is entitled to claim the O&M charges directly from the HT/EHT consumers?
- (c) Whether the IPPs are liable to pay the O&M charges as claimed by the Petitioner?

9) The Commission's analysis and decisions thereon are discussed below.

10) **POINT No.(1)** : *Whether the Petition is maintainable?*

(a) The Petitioner has filed this Petition under Sections 86 and 94 of the Electricity Act, 2003. While Section 86 deals with the functions of the Commission, Section 94 pertains to the powers of the Appropriate Commission. The Petitioner has not stated the sub-section under which the Petition has been filed. The contention of the stakeholders is that the Petition needs to be rejected, as a specific sub-section is not mentioned.

(b) We feel it appropriate to quote the decision of the Hon'ble Supreme Court of India in Civil Appeal No.4643 of 2009 (*P.K. Palanisamy –Vs- N.Arumugham and another*), reported in (2009)9 SCC 173, wherein it is held in paragraph-27 as follows :

“... Only because a wrong provision was mentioned by the appellant, the same, in our opinion, by itself would not be a ground to hold that the application was not maintainable or that the order passed thereon would be a nullity. It is a well settled principle of law that mentioning of a wrong provision or non-mentioning of a provision does not invalidate an order if the

court and/or statutory authority had the requisite jurisdiction therefor.”

Therefore, it is settled law that the Courts have to mould the relief, even if a wrong provision of law is quoted, provided they have jurisdiction.

(c) We need to now see if the Commission has power/ jurisdiction to decide the point as to whether the petitioner can collect the charges from the HT/EHT consumers and IPPs. On coming into force of the Electricity Act, 2003, the exclusive power to determine tariff is vested with the Commission. This is envisaged in various provisions of the Act, viz., sections 42, 45, 46, 62, 86, etc. In this case the question is about collection of O & M charges, which is a part of tariff. Further, this is a dispute between the licensee and the generating companies on the levy of charges by the petitioner and falls under section 86 (1) (f) of the Electricity Act, 2003. Hence, the Commission has jurisdiction to decide the points raised in the petition.

(d) The next ground on which the petition is sought to be rejected is that none is arrayed as Respondent. Although the Petitioner has not arrayed the HT/EHT consumers and IPPs as Respondents, the Commission, taking note of the issue involved in the petition, provided an opportunity to all the affected parties to make submissions. Hence, the contention that the Petition has to be rejected for non-joinder of parties, is not accepted as the principles of natural justice have been followed in the proceedings. Therefore, we hold that the Petition is not liable to be rejected on this count.

11) POINT No.(2) : Whether the Petitioner is entitled to claim O&M charges directly from the HT/EHT consumers?

- (a) The Commission notes from the copies of the letters submitted by the objectors that the Petitioner has written to the IPPs, HT and EHT consumers to pay the O&M charges, as early as during August, 2012, even though it has filed the Petition before this Commission only on 28.04.2014. Some of the IPPs / consumers have already paid the amount claimed by the Petitioner.
- (b) Sections 39 and 40 of the Electricity Act, 2003 provide that the Petitioner is required to undertake transmission of electricity through intra-State transmission system from generating station to load centres, and to maintain and operate an efficient and co-ordinated and economical intra-State transmission system.
- (c) The duties of the distribution licensees (ESCOMs) are provided in Sections 42 to 49 of the Electricity Act, 2003. Under section 45(3), the ESCOMs are required to supply electricity to the consumers and can recover charges for such supply, which include fixed charges, electricity charges and rent or other charges, in respect of electrical meters or electrical plant provided by the licensee.
- (d) In Orissa State Electricity Board and another vs IPI Steel Ltd and others, reported in (1995) 4 SCC 320, the Hon'ble Supreme Court of India has explained the purpose of levy of demand charges on HT consumers as follows:

“10.....In the case of bulk consumers and large scale consumers, the Electricity Boards all over the country generally adopt a two-

part levy system. One part is called 'the maximum demand charges' and the other part 'consumption charges'.

.....

Normally speaking, a factory utilises energy at a broadly constant level. May be, on certain occasions, whether on account of breakdowns, strikes or shutdowns or for other reasons, the factory may not utilise energy at the requisite level over certain periods, but these are exceptions. Every factory expects to work normally. So does the Electricity Board expect - and accordingly produces energy required by the factory and keeps it in readiness for that factory - keeping it ready on tap, so to speak. As already emphasised, electricity once generated cannot be stored for future use. This is the reason and the justification for the demand charges and the manner of charging for it. There is yet another justification for this type of levy and it is this: demand charges and consumption charges are intended to defray different items. Broadly speaking, while demand charges are meant to defray the capital costs, consumption charges are supposed to meet the running charges. Every Electricity Board requires machinery, plant, equipment, sub-stations, transmission lines and so on, all of which require a huge capital outlay. The Board like any other corporation has to raise funds for the purpose which means it has to obtain loans. The loans have to be repaid, and with interest. Provision has to be made for depreciation of machinery equipment and buildings. Plants, machines, stations and transmission lines have to be maintained, all of which requires a huge staff. It is to meet the capital outlay that demand charges are levied and collected whereas the

consumption charges are levied and collected to meet the running charges.”

- e) All HT/EHT consumers of ESCOMs are charged Demand Charges and Energy Charges in the monthly consumption bills in the 2-part tariff, as per section 45(3) of the Act. The HT and EHT consumers are paying demand charges to the ESCOMs for maintaining the contract demand. The demand charges so collected reflect the recovery of the cost payable by the consumer for reservation of the capacity made by the ESCOM for the consumer and to protect the ESCOM from the risk of financial uncertainty due to non-realization of the contracted capacity by the consumer. Even if there is no consumption, the fixed cost has to be incurred by the ESCOM, which includes expenditure to provide and keep ready the contracted capacity to serve the consumer, viz., network and establishment cost, O&M charges, distribution cost, etc.
- (f) We note that the ESCOMs are maintaining HT lines of voltage levels of 11 kV & 33 kV and the petitioner is maintaining EHT lines of voltage level of 66 kV and above, supplying electricity to consumers. The petitioner cannot claim maintenance charges from HT consumers, whose lines are maintained by ESCOMs. The cost of maintenance of EHT lines maintained by the petitioner is factored in the Transmission tariff paid by ESCOMs to the petitioner. The Transmission tariff includes the cost of maintaining the EHT lines exclusively supplying electricity to a consumer or group of consumers. Therefore, the petitioner cannot collect O & M expenses for maintenance of the EHT lines separately from the EHT consumers. If the petitioner is permitted to collect O & M charges from the EHT consumers, for maintenance of the line, it would amount to charging them twice.

(g) The Commission notes that the action of the Petitioner in claiming O&M charges / collecting the charges pursuant to an order of the petitioner dated 17.8.2012 (Annexure P-4) without approval of the Commission, is not proper. On coming into force of the Electricity Act, 2003, the Commission alone has been vested with the power to determine tariff. In the circumstances, the Petitioner is to be directed to withdraw such notices, and refund the amount so collected from HT/EHT consumers of ESCOMs.

12) **POINT No.(3)** : *Whether the IPPs are liable to pay O&M charges, as claimed by the Petitioner?*

(a) We note that the IPPs have built the sub-station bays and the transmission lines at their cost and later on handed over the same to the transmission licensee for maintenance.

(b) Dedicated transmission line is defined under section 2(16) of the Electricity Act, 2003, as follows:

“Dedicated transmission lines” means any electric supply-line for point to point transmission which are required for the purpose of connecting electric lines or electric plants of a captive generating plant referred to in section 9 or generating station referred to in section 10 to any transmission lines or sub-stations or generating stations, or the load centre, as the case may be”

(c) Section 10 of the Electricity Act, 2003 reads as follows :

“10. Duties of generating companies

(1) Subject to the provisions of this Act, the duties of generating company shall be to establish, operate and

maintain generating stations, tie-lines, sub-stations and dedicated transmission lines connected therewith in accordance with the provisions of this Act or the rules or regulations made thereunder.....”

Under this provision, the generating company is duty bound to establish, operate and maintain the dedicated transmission line. A similar provision existed in section 18-A of the Electricity Supply Act, 1948, requiring a generating company to establish, operate and maintain the transmission line, as required by the appropriate Govt. The Petitioner's case is that it is maintaining the dedicated transmission line, built at the cost of IPPs, and it is entitled to maintenance charges. In respect of IPPs commissioned prior to 2005, the PPAs provided that the line would be maintained by the Board. In respect of IPPs commissioned after 2005, the PPAs provided that the line would be maintained by the generating company. In either cases, there were no maintenance charges fixed or agreed to be paid in respect of the maintenance of the dedicated transmission line. We are not able to comprehend the authority under which the work of maintenance of the line was undertaken by the petitioner after coming into force of the Electricity Act, 2003. In the absence of a mutual agreement between the parties, the act of the petitioner can be construed as a 'quasi contract' and the same falls within section 70 of the Contract Act, 1872, which requires that the petitioner needs to be compensated or paid for.

- (d) We note that while fixing tariff for sale of power by a generating company, the cost of the dedicated transmission line and the

maintenance cost of the line is factored in the capital cost of the plant. If the petitioner is maintaining the line, the generating company is required to pay the maintenance charges, which it has received in the tariff.

- (e) In view of the above, we hold that the IPPs are required to pay the O&M charges, if the maintenance of the dedicated transmission line is done by the Petitioner. However, we note that there is no mutually agreed rate between the petitioner and the IPPs to be paid as O & M charges for maintenance of the dedicated transmission line by the petitioner.
- f) Further, the amount of O & M charges, to be collected from the IPPs should be supported with facts and figures. The claim of the petitioner to recover the O & M expenses at the rate mentioned in Annexure P-4 is not supported by adequate material/ calculations or reasoning. Therefore, we deem it appropriate to direct the petitioner to file a separate petition if so advised, with material and calculations, in support of the claim in respect of the parameters mentioned below:

Voltage Class	O & M Expenses for transmission line per circuit km.(in Rs.)	O & M Expenses for transmission line bay at sub-station (in Rs.)
400 kv		
220 kv		
110 kv		
66 kv		
33 kv	-	
11 kv	-	

13) In the above circumstances, we pass the following:

ORDER

1. The petition is dismissed in so far as it relates to collection of O & M charges from the HT/EHT consumers. The Petitioner is directed to withdraw the notices issued to HT/EHT consumers and refund the amount so collected from HT/EHT consumers.

2. The petitioner is entitled to collect O & M charges from the IPPs, if the petitioner maintains the dedicated transmission line, subject to such charges being mutually agreed between the parties and in default, being adjudicated by the Commission.

Sd/-

(M.R. SREENIVASA MURTHY)
CHAIRMAN

Sd/-

(H.D. ARUN KUMAR)
MEMBER

Sd/-

(D.B. MANIVAL RAJU)
MEMBER

Annexure**List of stake holders:****List of persons who participated in Public Hearing.**

Sl.No.	Name of the Participant
1	Sri Shridhar Prabhu, Advocate, for of REDAK, SISMA & Sathavahaana Ispat.
2	Sri Mallappa Gowda & Sri Rajagopal of KASSIA.
3	Dr. Gubbi Subba Rao, Advocate on behalf of FKCCI.
4	Sri G.N. Krishnappa, Electrical Contractor.
5	Ms. Janani Shankar, Advocate for EDCL
6	Sri Vinayak Puranik & Sri Mohan Patil of Renuka Sugars Ltd. & Gokak Sugars Ltd.
7	Sri K.R. Sreenivasa for IWPA
8	Sri A.S. Upadhyaya of Sunvik Steel.
9	Sri Pradeep Kore of Graphite India.
10	Sri Sandeep Choudhari of Bangalore International Airport Ltd.
11	Sri G. Dharmalingam of Chamundeshwari Sugars Ltd.
12	Sri Sridhar of NSL Sugars Ltd.
13	Sri Venkata Ratnam, Manipal Health Systems.
14	Sri Hariharan of Pioneer Wincon Ltd.
15	Sri T. G. Ashwathanarayana of Limbavali Power Ltd.
16	Sri B.G. Mallya, Chief Electrical Engineer, BMRCL
17	Sri C.C. Anishettar, CEO, Master Power Ltd.
18	Sri B.N. Gokul, BIOCON
19	Sri T. Bhaskara, Cauvery Neeravari Nigam Ltd.
20	Sri K.R. Manjunath, DGM, HMT Ltd.
21	Sri P. Deepak, TKML
22	Sri Rajendra R. Edward, Pioneer Wincon Pvt Ltd
23	Sri Nikhil Ranjith, IWTMA

List of persons who have filed written response:

Sl.No.	Name
1	Graphite India Ltd.
2	Hindustan Machine Tools Ltd.
3	V.M. Salgaocar & Bro. Pvt. Ltd.
4	Pioneer Wincon Pvt. Ltd.
5	The Ugar Sugar Works Ltd.
6	Petronet MHB Ltd.
7	Prasar Bharathi, Yelahanka New Town, Bengaluru
8	Jubilant Generics – EHT Consumer, KAIDB Area, Nanjangud
9	Gokak Power & Energy Ltd.
10	FKCCI, Bengaluru.
11	Gokak Textiles, Gokak.
12	Sri P.S. Shanmugam, Owner of Wind Mill at Gadag, from Chennai.
13	Mahatma Gandhi Sahakara Sakkare Karkhane (N), Bhalki, Bidar
14	Sri Doodhaganga Krishna Sahakari Sakkare Karkhane Niyamit, Chikkodi
15	Srinivasa Hatcheries Ltd., Jubilee Hills, Hyderabad.
16	Sunvik Steels Pvt. Ltd., EHT Consumer, Bengaluru.
17	Sai Nireeha Power Project Pvt. Ltd., Mini Hydel Project, Arakalgud Taluk, Hassan
18	Reid and Taylor (India) Ltd, EHT Consumer & IPP, Thandavapura, Nanjangud Taluk
19	ITC Limited, Bengaluru.
20	IWPA, Bengaluru.
21	Master Power.
22	Mrujaara Power Plant (Power Plant), Shimoga.
23	Aspen Infrastructures Ltd, Udupi
24	Cauvery Neeravari Nigam Ltd.
25	BIOCON Ltd.
26	IWTMA
27	Nestle India Ltd, Nanjangud
28	EDCL
29	Gokak Sugars
30	Shree Renuka Sugars Ltd
31	KASSIA
32	South Indian Sugar Manufacturers Association
33	WIPPA