

No.N/55/2022

---

**BEFORE THE KARNATAKA ELECTRICITY REGULATORY COMMISSION,  
No. 16 C-1, Miller Tank Bed Area, Vasanth Nagar, Bengaluru- 560 052.**

**Dated: 23.05.2023**

**Present**

<b>Shri P. Ravi Kumar</b>	<b>.. Chairman</b>
<b>Shri H.M. Manjunatha</b>	<b>.. Member (Legal)</b>
<b>Shri M.D. Ravi</b>	<b>.. Member</b>

**OP No.07/2022**

**BETWEEN:**

Karnataka Power Transmission  
Corporation Limited  
1<sup>st</sup> Floor, Kaveri Bhavan,  
Kempegowda Raod  
Bengaluru-560 009.

**... PETITIONER**

(Represented by its Managing Director)

(Represented by Sri Shahbaaz Husain Advocate  
for Precinct Legal)

**AND**

NIL

**.... RESPONDENT**

**ORDERS**

1. The petitioner has filed this petition under Section 86(1)(c), (g) and Section 94 of the Electricity Act, 2003, praying for the following reliefs:

- a) To allow the Petitioner to recover the charges from the generators for utilizing the common infrastructure of the Petitioner to construct terminal bays works at the Petitioners substation under self-execution basis and also to interconnect

the power from terminal bays to the Petitioners transmission network;

- b) To allow the Petitioner to recover the charges for using the common infrastructure of the Petitioner as per the Petitioner's order dated 03.09.2020 and 11.12.2020;
- c) To pass such other Orders as deemed fit in the interest of justice and equity.

2. The relevant facts for the disposal of present case made out by the Petitioner may be stated as follows: -

- a) The Petitioner seeks approval to impose charges upon the generators who are utilizing or who propose to utilize the assets of the Petitioner for the purpose of interconnection to the terminal bay or in other words to connect to the transmission infrastructure. The Hon'ble High Court of Karnataka in WP No. 757 of 2021 (GM-KEB) dated 21.09.2021 (Annexure-A) observed that, the petitioner must in accordance with law seek approval of the Commission to levy charges towards usage of common infrastructure. The operative portion of the order reads as follows: However, it is open for the Corporation to take action for levy of one-time non-refundable charge towards "common infrastructure" in accordance with law. The impugned communications as well as demand notice dated 14.12.2020 are hereby quashed.
- b) Brief Grounds: The Petitioner is a State Transmission Utility, having a deemed transmission license under EA, 2003. The Petitioner is primarily responsible for the Electricity Transmission Network of Karnataka and discharges such responsibilities, duties and functions as contemplated

under the Electricity Act, 2003 for a transmission licensee. Further, the Petitioner has been paying license fees year after year to the KERC.

- c) The Petitioner maintains a vast transmission network that includes bays, lines, substations, which aids the transmission of electricity from the source of generation to the distribution network or to Open Access Consumer as the case may be. This Commission determines the tariff under Section 62 of the Electricity Act at which the Petitioner transmits the electricity; such tariff inter alia includes the cost of infrastructure and O & M charges and employee cost. Section 10 of the EA describes the duties and responsibilities of the generators to establish and maintain dedicated lines and bays. Subject to the provisions of this Act, the duties of a 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.
- d) The generating companies generate power at various sites in Karnataka depending on their feasibility; such power has to be evacuated and connected to the aforesaid common transmission network of the Petitioner. In such evacuation of power, the generating companies are obliged to establish and maintain dedicated transmission lines and bays under the supervision of the Petitioner. The terminal bay is a point in the petitioner substations at which a generating plant and its associated equipment is connected to the transmission system of KPTCL. The terminal bays act as area of intersection in transmitting the electricity

from the dedicated line of the generator to the transmission network of the Petitioner.

- e) The Generators ought to connect to the terminal bay at the substation of the Petitioner in order to facilitate onward conveyance of power through the lines of the Petitioner. Wherefore, the Generators must connect to the terminal bay in a sub-station, by using infrastructure of the Petitioner developed in the sub-station, such as cable duct, control room, station structure, earth mat, yard lighting etc. A Sub-station is developed by the petitioner to facilitate transmission of power to the DISCOMs who in turn distribute power to the end consumers. Such being the case, an individual generator who gets connected to the sub-station for evacuating the power for his commercial transaction is required to pay for the use of Common Infrastructure. The bays are situated within the premises of the petitioner sub-station, the entry to which is restricted for the generators and outsiders for the purpose of security. The maintenance of the terminal bay is inevitably carried out by the petitioner. Such maintenance has been ordered to be compensated by the generator as per the order of the Commission dated 14.01.2018(Annexure-B).
- f) The Petitioner, in addition to its right to collect O&M charges in respect of dedicated lines and bays, passed an Order dated 03.09.2020 w.r.t. 'Collection of charges towards usage of KPTCL Common Infrastructure, utilised by the Generator for construction of terminal bay works carried out at KPTCL substation under self-execution basis' (Annexure-C).

- g) The generators who uses the common infrastructure such as 'cable duct, control room, station structure and bus, AC Supply DC Supply, earth mat, yard lighting, etc.' for construction of dedicated terminal bays shall in light of the mandate under Section 10 of EA, 2003, duty bound to pay appropriate monetary compensation.
- h) It was noted by the Petitioner that several TL&SS divisions did not raise demand of the charges in accordance with the Corporate Order dated 03.09.2020, to the concerned IPPs in their jurisdiction. It was also noted that payments of the charges were not time bound and no interest was specified in the said Orders. Thus, in continuation of the letter dated 03.09.2020, the Petitioner passed another Corporate Order dated 11.12.2020 stipulating time line for the payment of charge for usage of common infrastructure (Annexure-D). The generators are using the assets of the Petitioner in a non-gratuitous way, as a result the generators are duty bound to compensate the petitioner under Section 70 of Indian Contract Act, 1872.
- i) It is submitted that the cost of construction and maintenance of the common infrastructure is being met from the transmission tariff of the Petitioner, which is borne by the consumers in general. The transmission tariff, under the scheme of EA. 2003, shall be restricted to expenditure incurred by the Petitioner in establishing, operating and maintaining the transmission network from the point of injection of energy from the generating plant into the Petitioner's grid up to interface point of distribution network.

- j) Generators / IPP are commercial entities, who generate electricity from various sources and sell it to other consumers at a profit. The cost of constructing infrastructure in Stations is borne in transmission tariff which is recovered from consumers. Therefore, spending Capex exclusively for serving consumers is to be borne by consumers. But allowing generators to make use of infrastructure, for which charges are borne by the consumers, for their commercial interest is not right; which is against the public interest and resulting in unnecessary burden to the consumers.
- k) The collection of charges towards usage of common infrastructure of the Petitioner would be treated as "income" and the same would be adjusted against the expenditures of the Petitioner which would in effect will lower the transmission tariff.
- l) The proposed methodology for quantifying the "Common Infrastructure charges" payable by the generators is given in tabular form. The Order dated 03.09.2020 elaborates upon the charges payable by the Generators for utilizing the common infrastructure charges. The charges payable is based upon Schedule of Rates of the Petitioner prevailing at the time of interconnection. The table indicating, the charges payable at the current Schedule of Rates by the generators are produced hereunder:

<b>Terminal Bay of the Generator</b>	<b>Charges in Rs. Lakhs as per SR 2019</b>
11kV Terminal Bay	4.00
33kV Terminal Bay	10.00
66kV TB at 66/11kV or 66/33kV KPTCL sub-station	14.50

66kV TB at 220/66kV KPTCL sub-station	18.00
66 kV TB at 110/33/11kV or 110/11kV KPTCL sub-station	16.50
110kV TB at 220/110kV KPTCL sub-station	21.00
220kV Terminal Bay	38.00

m) The Petitioner has requested the Commission that in view of the methodology proposed above, permit the Petitioner to charge the Generators for utilizing the common infrastructure of the Petitioner to construct the terminal bays and to interconnect to the Petitioner's infrastructure accordingly.

n) As the charges claimed by the petitioner will in term affects the generators the Commission decided to conduct a Public Hearing. A Public Hearing Notice was issued as per procedure and published in paper, Times of India dated 26.07.2022 and Vijayavani (Kannada) dated 26.07.2022. Even the Public Hearing Notice and details were hosted on Commission's website [www.kerc.karnataka.gov.in](http://www.kerc.karnataka.gov.in). Accordingly, the Public Hearing was held on 26.08.2022 at the Commission Court Hall.

3. Meanwhile KPTCL vide its email dated 25.08.2022 has submitted its letter No. KPTCL/B117/25719/2021-22/904-907 dated 25.08.2022 furnishing replies to the comments / objections of M/s Apraava Renewable Energy Pvt Ltd. M/s Gokak Sugars Ltd and M/s Shree Renuka Sugars to the Commission. The comments and reply in brief is as follows.

SI No.	Generator	Comments	KPTCL reply
01	Apraava Renewable Energy Pvt. Ltd.	<p>1. In line with the evacuation approval, Generators have already paid one-time non-refundable charges as network augmentation charges at the time of Project development to the KPTCL</p> <p>2. These network augmentation charges being collected by KPTCL shall be used to develop and strengthen their existing networks beyond the interconnection point from time-to-time, which covers certain infrastructure of KPTCL used by Generators mentioned in clause 14 of Original petition 07 of 2022 and referred as "Common Infrastructure".</p> <p>3. In addition to above charges, Generators are paying annual operation and maintenance (O&amp;M) charges to KPTCL towards operation and maintenance of terminal bay and dedicated transmission line constructed and handed over to</p>	<p>1. The network augmentation charges are collected for existing network strengthening activities beyond the interconnection point and it does not include the common infrastructure facilities developed by KPTCL within the premises of its Sub-Station.</p> <p>2. Common Infrastructure charges of KPTCL are not covered under any charges other than the proposed one-time non-refundable charges on common infrastructure facilities.</p> <p>3. Operation &amp; maintenance (O&amp;M) charges collected from Generators is for maintenance of terminal bay, collected on a periodic basis. Whereas the Common Infrastructure charges are one time charges proposed for the use of infrastructure developed by KPTCL.</p>



		<p>KPTCL in compliance to evacuation approval.</p> <p>4. In view of the above stated fact, it is our humble submission that by taking care of the Evacuation infrastructure up to the interconnection points the Generators are already fulfilling their duties as specified under section 10(1) of the Act, and that it is the duty of KPTCL to maintain the transmission infrastructure beyond interconnection point as specified in the relevant regulations/code of the Commission.</p>	
02	Gokak Sugars Limited	1. The Karnataka Power Transmission Corporation Limited (KPTCL) Demand towards usage of its common infrastructure by the generators, is contrary to Section 62 of the Electricity Act, 2003.	1. At present, the cost of construction of common infrastructure and maintenance thereon is being met from the transmission tariff of KPTCL determined under Section 62 of the Electricity Act, 2003, which is being borne by common consumers. The Generators are commercial entities who are selling power to consumers for a profit, hence it would be appropriate to collect charges specifically from generators in the interest of common consumers. If the charges are allowed to
03	Sree Renuka Sugars Limited	2. That the said common infrastructure charges are covered in the fuel & adjustment costs while determining the generic tariff order. Therefore, levy of such charges twice is illegal and contrary to the Act and against KERC	

		Rules and Regulations.	be recovered from Generators, transmission tariff gets reduced to that extent and thereby will not be a burden to the common consumers. 2. The Fuel and adjustment costs are not related to the cost of construction of common infrastructure
--	--	------------------------	--

4. At the time of Public Hearing the representatives of certain generator companies have submitted their contentions on determination of one time non-refundable charges towards sparing the common KPTCL infrastructure utilized by the generators.

a) The representative of Sri Renuka Sugars and Gokak Sugars submitted that few co-generation plants have been connected with KPTCL grid during 2002-2003, major plants got connected with the KPTCL grid in 2007 and are having PPA with the ESCOM. The line terminal bays of the co-gen plants were constructed under self-execution basis. Thus, the proposal for levy of one time non-refundable charges towards interconnection with the KPTCL grid is discouraging to the generators as they are receiving the tariff determined by the Commission. The KPTCL stations are quite old and thus, the value of assets has been fully depreciated. The generators pay land charges (in case the line terminal bays are constructed within KPTCL sub-station) and O&M charges toward the maintenance of line terminal bays (dedicated

transmission line, in case the maintenance is being done by KPTCL). In addition to the charges mentioned above, transmission charges are being paid by the generators - wheeling energy under Open Access. Accordingly, levy of these charges will amount to double charge on them.

- b) The representative of Bellary Iron Ore Pvt Ltd., submitted that they have entered into PPA with ESCOMs for 20 years and levy of any additional charges will pose an additional burden for the generators, as these charges cannot be passed on to the consumers.
- c) The representative of Vestas Wind Technology Chitradurga Wind Pvt. Ltd., submitted that KPTCL has collected 5 Lakhs/MW as system augmentation charges along with O & M charges towards maintenance of line terminal bays. As such, the proposed one time non-refundable charges should not be levied. It is informed that, for exclusive bays, control panels are supplied by the generators. That there is no clarity on how the proposed one time non-refundable charges will be shared among the generators, in case other generators gets connected to the existing line terminal bay of a generator in future. He also requested that the proposed charges if levied, should be prospective in nature.
- d) The representatives of Apraava Renewable Energy Pvt. Ltd. (formerly known as CLP Wind Farms (India Limited) also opposed the KPTCL's demand towards payment of one time charges for utilizing the common infrastructure, as they have already paid charges towards

system augmentation at the time of getting interconnection and are paying O&M charges also.

- e) The learned counsel representing KPTCL submitted, that under Section 10 of the Electricity Act 2003, the infrastructures established and utilized by the generators have to be maintained by the generators. Also submitted that if necessary, clarification regarding 'refundable' to 'non-refundable' will be obtained from the Hon'ble High Court.
  - f) KPTCL clarified that the charges proposed are not related to the O&M charges collected by KPTCL, instead the proposed charges are one-time charges towards usage of common infrastructure of the KPTCL. The charges proposed are meagre and will not have much impact on the tariff. That they have determined these charges separately for different voltage class.
  - g) The Commission enquired with regard to the difference in one time charges as determined by KPTCL, in its Board Order and the charges that are submitted in its Petition. KPTCL informed that difference is due to inclusion of 'system automation charges'.
5. As per the pleadings in the petition, additional submissions of KPTCL on oral hearing and considering written comments of the stake-holders who have attended public hearing, the following points arise for consideration:

Point No.1: Whether KPTCL is entitled to collect one-time non-refundable infrastructure charges for the use of the common infrastructure of KPTCL by the generator?

Point No.2: Whether the claim of KPTCL for recovery of common infrastructure charges, so far as the existing generators who are provided with space within the KPTCL sub-station can be decided by the Commission?

Point No.3: Whether the claim of KPTCL for recovery of common infrastructure charges, so far as the prospective generators who would seek the space within the KPTCL sub-station can be decided by the Commission?

Point No.4: If point no. 1 is held affirmative, whether such claims can be allowed with retrospective effect?

Point No. 5: What should be the methodology to arrive at the charges payable towards usage of common Infrastructure of KPTCL?

Point no. 6: What Order?

6. After considering the material on record and the pleadings and the submissions of the stakeholders in public hearing, our findings on the points are as follows:

7. Point No.1: Whether KPTCL is entitled to collect one-time non-refundable infrastructure charges for the use of the common infrastructure of KPTCL by the generator?

a) KPTCL in its Petition, has contended that, while interconnecting KPTCL sub-station, IPPs utilize the existing infrastructure developed by KPTCL at its substation i.e., Bus Potential Transformer, AC Distribution Board, DC Distribution Board, Cable Ducts, Earth mat, Land Levelling, Bus Bar, Yard Lighting, Space for placing C&R Panel. During the audit of Financial

year FY19, the statutory auditors have made an observation that the KPTCL is not having proper policy / procedure for recovery of cost of infrastructure spared to the generators. In view of auditor's observation, KPTCL issued board order No. KPTCL/328(a)/32543/12-13 dated 03.09.2020, for collecting the cost of infrastructure. Aggrieved by the above said order the generator filed WP 757 of 2021 (GM-KEB). Hon'ble High Court passed an Order dated 21.11.2021 allowing the Writ Petition and instructed KPTCL to take action for levy of "common infrastructure" in accordance with law. Accordingly, the liberty was granted to the KPTCL to approach the KERC.

- b) Therefore, it is apparent that the Commission has to adjudicate on the plea of KPTCL to recover the one-time non-refundable infrastructure charges from the generator for utilising the common infrastructure of the KPTCL substation.

In this regard, it may be noted that in accordance with Section 10 of the Electricity Act, 2003, it is the responsibility of the generator to establish, operate and maintain generating stations, tie-lines, sub-stations and dedicated transmission lines connected therewith. Section 10 of the EA, 2003 is enunciated below:

*Section 10 of the Electricity Act repose onus and duties on the generator: Subject to the provisions of this Act, the duties of a 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.*

The dedicated transmission lines, transmission lines are defined under the Electricity Act, 2003, as under:

*Section 2 (16) defines "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;*

The transmission line is defined under section 2 (72)

*"transmission lines" means all high pressure cables and overhead lines (not being an essential part of the distribution system of a licensee) transmitting electricity from a generating station to another generating station or a sub-station, together with any step-up and step-down transformers, switch-gear and other works necessary to and used for the control of such cables or overhead lines, and such buildings or part thereof as may be required to accommodate such transformers, switch-gear and other works.*

*Section 2 (51) defines "premises" includes any land, building or structure.*

*The word grid is defined under section 2(32) grid means the High voltage back bone system of interconnected transmission lines, sub-station and generating plants.*

Accordingly, KPTCL in its evacuation approval letter to the generators specify that they are required to purchase suitable adjacent land for

construction of terminal bay for terminating the evacuation line. However, owing to certain difficulties faced by the generators regarding procurement of land adjacent to KPTCL substation and keeping in view the ease of doing business for fast tracking the grant of connectivity, KPTCL on the request of generators, provides a parcel of land along with associated facilities within its sub-station for construction of line terminal bay and connecting it to the control-panel in the KPTCL sub-station. Has the generator developed the line terminal bay along with the associated facilities in a piece of land adjacent to the KPTCL sub-station, the generator would have ended up meeting all the charges required to purchase of all the equipments in order to provide the said inter-connection and safety against natural calamities like the Earth mat, Bus Potential Transformer, AC Distribution Board, DC Distribution Board, Cable Ducts, Land Levelling, Bus Bar, Yard Lighting, Space for placing C&R Panel.

Therefore, under section 10 of EA, the generator has to meet the cost of infrastructure till the point of interconnection. Thus, apart from the cost of land spared in the sub-station for construction of bay, a generator has to bear cost of common infrastructure necessary to provide interconnection with KPTCL sub-station and also cost towards facilities like earth mat, cable duct, control room, station structure, yard lighting etc. otherwise incurred by the KPTCL, by way of one-time non-refundable infrastructure charges.



Therefore, it is the duty of a generator to pay one-time common infrastructure charges towards the facilities extended by KPTCL to ease the process of getting interconnection apart from O&M charges and network augmentation charges collected for undertaking O&M of line terminal bays and strengthening activities of existing network beyond the interconnection point, respectively. It is also pointed out under Section 30 of EA that the State Commission is required to facilitate and promote transmission, wheeling and interconnection arrangements for transmission and supply of electricity by economical and efficient utilization of electricity. Section 40 provides for duties of transmission licensee:

- (a) To build, maintain and operate an efficient, co-ordinated and economical inter-State transmission system or intra-State transmission system, as the case may be;*
- (b) To comply with the directions of the Regional Load Despatch Centre and the State Load Despatch Centre as the case may be;*
- (c) To provide non-discriminatory open access to its transmission system for use by-*
  - (i) Any licensee or generating company on payment of the transmission charges; or*
  - (ii) Any consumer as and when such open access is provided by the State Commission under sub-section (2) of section 42, on payment of the transmission charges and a surcharge thereon, as may be specified by the State Commission.*

It is rightly contended by the Petitioner that the construction and maintenance cost of common infrastructure is being met from the

transmission tariff of KPTCL determined under section 62 of the EA which is being borne by the general consumers. As discussed in the previous paras, if a generator has to purchase the land adjacent to the substation for establishment of line terminal bay, then the generator will have to bear the cost of infrastructure thereon besides providing safety measures and other associated facilities, which will be a burden on the generator and to that extent the burden is reduced by KPTCL. Section 86 of EA empowers the Commission to determine the charges leviable for promoting co-generation and generation of electricity from renewable sources of energy by providing suitable measures for connectivity with the grid and sale of electricity to any person, and also specify for purchase of electricity from such sources. The Commission may equipoise and offset the adverse financial impact on any generating or transmitting or distributing company, protecting the interest of consumer. On considering the cumulative effect of materials placed by the KPTCL and the generating companies, it is just and proper to equipoise the expenses met by the KPTCL by allowing levy of one-time common infrastructure charges.

The Petitioner relied upon section 70 of Contract Act to substantiate its claim, which reads thus: -

*Section 70 of the Contract Act, where a person lawfully does anything for another person, or delivers anything to him, not intending to do so gratuitously, and such other person enjoys the benefit thereof, the latter is bound to make*

*compensation to the former in respect of, or to restore, the thing so done or delivered.*

It is clear that the KPTCL does not intend to lend the landscape with safety measures developed for the interconnecting transmission line, terminal bay and safety infrastructure developed there in the premises of KPTCL in a gratuitous way, which deserves the allowing of the collection of infrastructure charges. It is not emphasized by the generators that the one-time non-refundable common infrastructure charges was collected by KPTCL in any other form or inclusive of these charges peculiar to the cost of safety land scape and infrastructure developed by KPTCL to connect to their system.

Thus, the Commission is of the view that it is the duty of a generator to pay the one-time common infrastructure charges towards the facilities extended by KPTCL to ease the process of getting interconnection apart from O&M charges and network augmentation charges collected towards O&M of line terminal bays and strengthening activities of existing network beyond the interconnection point, respectively. Hence Point No.1 is affirmative.

Point No.2: Whether the claim of KPTCL for recovery of common infrastructure charges, so far as the existing generators who are provided with space within the KPTCL sub-station can be decided by the Commission?

Sparing of a space within the substation along with the common infrastructure by KPTCL is a regular practice and is a facility provided by

KPTCL to the generators. The developed space inside the substation is the property of KPTCL which the KPTCL offers to the prospective generators in lieu of certain consideration. There is no compulsion for the prospective generators to purchase the land parcel at the price quoted by KPTCL. Therefore, in such circumstance there could not be any dispute between KPTCL and prospective generator. Hence, it is outside the purview of the Commission to determine the price for renting out the space. When KPTCL parts with its already developed space, in all possibility, the infrastructure charges should have been included in it. In future for the prospective generators seeking space in the substation for construction of bay, the KPTCL may include all its charges for parting with the space and associated facilities.

Point No.3: Whether the claim of KPTCL for recovery of common infrastructure charges, so far as the prospective generators who would seek the space within the KPTCL sub-station can be decided by the Commission?

For the above reasons, the Commission is of the view that so far as prospective generators are concerned, the Commission need not to determine the charges.

Point No.4: If point no. 1 is held affirmative, whether such claims can be allowed with retrospective effect?

For the above reasons, the Commission is of the view that the Order cannot be retrospective in nature and such claims cannot be allowed with retrospective effect.

Point No. 5: What should be the methodology to arrive at the charges payable towards usage of common Infrastructure of KPTCL?

In the view of the above findings the question does not arise.

Point no. 6: What Order?

### **ORDER**

The Petition is partly allowed holding that:

- a. it is the duty of a generator to pay the one-time non-refundable common infrastructure charges towards the facilities extended by KPTCL to ease the process of getting interconnection apart from O&M charges and network augmentation charges collected towards O&M of line terminal bays and strengthening activities of existing network beyond the interconnection point, respectively.
- b. it is outside the purview of the Commission to determine the price for renting out the space owned by KPTCL.
- c. The Commission is of the view that so far as prospective generators are concerned, the Commission need not to determine the charges

of the parcel of land along with the common infrastructure owned by KPTCL, within its sub-station.

- d. The Order cannot be retrospective in nature and such claims cannot be allowed with retrospective effect.
- e. All pending I.As also do not survive for consideration, accordingly they stand disposed of.

Sd/-

(P. RAVI KUMAR)  
Chairman

Sd/-

(H.M. MANJUNATHA)  
Member (Legal)

Sd/-

(M.D. RAVI)  
Member