No.28012/1/2014-CA-II Government of India Ministry of Coal

Shastri Bhawan, New Delhi Dated the 2.1.2015

ORDER

Sub: Fixation of Transfer Price of Lignite for Neyveli Lignite Corporation (NLC) Mines -reg.

The Guidelines for the period 2009-14 were issued by the Ministry of Coal (MoC) vide Order no.43011/2/2004-Lig-CA-II dt.11.06.2009 on the basis of which year wise lignite price for the period was calculated and the same were adopted by the CERC while finalizing the power tariffs.

- 2. Similarly, for the period 2014-19, the guidelines for pricing of lignite from NLC mines have to be issued, corresponding with the regulation issued by CERC for the power sector for the same period. In this connection, a proposal was received from NLC on 24.06.2014 indicating element wise norms and parameters for consideration and the same was circulated to the beneficiaries vide letter no 28012/1/2014-Lig./CA-II dated 08.10.2014 and their comments were sought for. Tamil Nadu Generation and Distribution Corporation Limited (TANGEDCO), Kerala State Electricity Board (KSEB) and Power Company of Karnataka Limited (PCKL) submitted their comments vide their letters dated 25.10.2014, 30.10.2014 and 19.12.2014 respectively. These were forwarded to NLC for their response and NLC submitted their reply vide their letter dated 20.12.2014.
- 3. The issues raised by the beneficiary SEBs are summarized below:

A. TANGEDCO

- (i) Capacity Utilisation (CU): Actual CU during the previous five years was between 90 to 95%. Hence, CU shall be fixed at 90%. Incremental cost over and above the CU factor shall be adopted to encourage higher performance.
- (ii) Funding pattern Debt: Equity: In case of Net Fixed Asset (NFA) method, equity should not be more than 30% and if it exceeds 30%, Return on the excess shall be paid at weighted average interest rate on actual loan.
- (iii) Additional capitalization: After assessing capacity of equipment, additional requirements shall be justified and increase in performance level above norms need to be ascertained.
- (iv) Depreciation: With respect to equipments other than SME, depreciation will be charges as per Companies Act. For SMEs, depreciation rates provided in

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- MCA letter Dt 29.08.2007 needs to be examined with respect to the deprecfiation rates under Companies Act 2013.
- (v) Operation and Maintenance Expenses: No justification has been furnished for the increase in rate of escalation. Increase in escalation from 8% to 11.5% during 2009-14 has resulted in huge profits for NLC. Escalation rate of 6.31% as per CERC Regulations may be adopted.
- (vi) OB removal expenses: Already included in the Project cost. Earlier guidelines did not contemplate recovery of such expenditure.
- (vii) Components of Working Capital: No justification for inclusion for one month lignite stock. CERC Regulation provides for inventory of 45 days. Since Mines are captive, there is no need for inventory. In the earlier period, no inventory of lignite was considered.
- (viii) Interest on Working Capital: Existing practice of SBI PLR may be continued.
- (ix) Interest on Loan: Normative loan cannot be applied for existing Mines. In case of new mines where COD is after 01.04.2014 then the normative loan can be considered as per CERC guidelines.
- (x) Foreign Exchange Rate Variation (FERV): FERV will be treated as loan and no part will be considered as equity.
- (xi) Statutory Payments: royalty is already included as a part of generation tariff and there is no need to charge in lignite price.
- (xii) Mine Closure expenses: No retrospective effect is acceptable.
- (xiii) Delayed payments: Surcharge at 18% p.a. is included in generation tariff. Providing surcharge for lignite will amount to double charge.
- (xiv) Adjustment of receipts: Not applicable in respect of mines.

B. KSEBL

- (i) Capacity Utilisation factor: Excess lignite produced above normative capacity utilization shall be charged at marginal cost only. Revenue earned through sale of lignite outside NLC power stations shall be shared with the beneficiaries.
- (ii) Funding Pattern: CERC norms including normative debt equity may be adopted.
- (iii) Additional Capitalisation: CERC regulations for additional capitalization may be followed. Proposal of NLC for additional capitalization based on annual budget/ plan may be rejected.
- (iv) Depreciation: Depreciation rate adopted by CERC for power projects may be adopted in mines also.
- (v) O&M expenses: Escalation rate at 6.04% may be applied over the expenses of 2013-14 and thereafter escalated at 6.64% in line with CERC.
- (vi) Over burden removal expenses: Since it is already included in O&M, it will result in double recovery. It should be declined.
- (vii) Components of working capital: NLC mines are established for their own power stations at pithead. Hence there is no need for allowing lignite stock.



- CERC regulation already includes lignite stock for 15 days as part of working capital. Hence allowing one month lignite stock for mines may result in double payment.
- (viii) Return on Equity: Grossing up of return on equity may be done at effective tax rate ie the tax corresponding with the core business in line with CERC regulations. Tax on income from sale of lignite to outside NLC stations shall not be allowed to be grossed up.
- (ix) Foreign exchange rate variation: It shall be in line with CERC regulation
- (x) Delayed payments and adjustment of receipts: No direct sale of lignite to distribution utilities and hence it should be rejected.

C. PCKL

- (i) O&M expenses escalation: No justification furnished. Outcome of truing up of O&M expenses of previous tariff period is not furnished. Even the existing 11.50% is not established. Linking of escalation to WPI/CPI has to be followed for escalation for projects provided under bid route.
- (ii) OB removal expenses: No such claim has been made till date. It is part of O&M expenses.
- (iii) Working capital: No such provision in 2009-14 guidelines. CERC regulation provides for 15 days stock. Allowing one month storage of lignite in mines is not required and will burden the ultimate consumers. Mines and Thermal are integral part of NLC.
- (iv) Interest on working capital: The rate mentioned may be clarified as SBI Base Rate plus 350 basis points in line with CERC.
- (v) Delayed payments: Not relevant for the determination of the lignite transfer price.
- (vi) Capacity utilization: Expenditure towards excavation of lignite is already covered in 85%. Differential pricing has to be followed for lignite excavated beyond 85%.
- (vii) Funding pattern: Equity investment in excess of 30% to be treated as normative loan. If equity investment is less than 30% actual should be considered.
- (viii) Additional capitalization: It shall be within the original scope of the work of the project or the budgeted plan subject to prudence check by MoC / Competent Authority.
- (ix) Depreciation: The existing MOC guidelines may be continued taking into account the Companies Act, 2013.
- (x) Interest on Loan: It should be in line with CERC.
- (xi) Income Tax, Interest and return on equity: To be in line with CERC regulation. In case of commissioning of mines and generating plant is not ready, the incentive of 0.5% ROE should not be allowed.
- (xii) FERV: To be in line with CERC regulations.
- (xiii) Statutory Payments: No Comments.





- (xiv) Mine Closure: MoC guidelines to be followed.
- (xv) Adjustment of receipts: Not relevant for transfer price.
- 4. The response of NLC on the issues raised by the beneficiary SEBs are as under:-

(i) Capacity Utilisation (CU):-

This CU of 85% is in line with industry practice, deliberation and decision in earlier tariff periods in order to incentivise the company for achieving higher level of efficiency and performance.

Mining industry operation is risky and depends on vagaries of Nature. The OB-lignite ratio is becoming unfavourable and higher than that worked out in FR and further lignite seam washout in some areas is encountered.

The performance of mines depends upon various factors such as operational conditions, land availability, space constraints, blasting requirements and continuous water management. The performance of mines over its entire life is to be taken into consideration, while fixing parameters and should not be based on any sporadic performance. Since, inception, mines have achieved mine capacity utilisation of less than 85% cumulatively.

The quantity outside sales referred by KSEB includes sale of 19 LT p.a to TAQA (IPP) at the same price charged to EBs and the balance qty alone is sold to outsiders which is in line with Feasibility Report based on which the Mine IA project has been sanctioned. NLC earns a meagre return on equity as both the business streams are regulated.

The transfer price is determined based on the policy of cost of production at normative level plus return on equity and there is no justification in seeking share from the revenue earned through outside sale.

(ii) Funding pattern:-

In line with earlier guidelines and CERC regulations, for old mines i.e Mine I, Mine, Mine I Expansion, Mine IA and Mine II, net fixed assets method and for New mines i.e. Barsingsar, Mine II expansion and any other new Mines, the Gross Fixed Asset mothod shall be followed. For mines covered under Gross Fixed Asset method with 70:30 Debt-Equity and normative funding will be considered. For mines covered under Net Fixed asset methodology with actual funding shall be followed.





(iii) Additional Capitalisation:-

In Mines, auxiliary equipment having life around 8 years need replacement to sustain production. Moreover, requirement of land is essential. Further, due to movement of mines, increased area of operation and higher OB-Lignite ratio, higher blasting requirement, additional equipments like Conveyors, CMEs, GWC equipments and roads etc are required. This will not increase the capacity of the Mine (lignite production). Under CERC Regulations there are provision for Compensation Allowance, Special Allowance for capital expenditure, capital spares consumed and also provision for Renovation and Modernisation for extension of Life are provided for.

Such allowances are not proposed in Lignite pricing Guidelines. Hence the capital additional based on budget is to be allowed subject to truing up at the beginning of next tariff period.

(iv) Depreciation:-

Mining Equipments are not comparable with Thermal Assets and CERC does not prescribe depreciation rate for mining assets.

Depreciation rates adopted are as per the provisions in the Companies Act. However, in respect of SMEs, against depreciation rate of 11.875% considering useful life of 8 years, depreciation @ 6.33% has been adopted by NLC, considering life of 15 years, with the approval of Ministry of Corporate Affairs.

(v) Operation and Maintenance(O&M) Expenses:-

For 2009-14, the actual CAGR escalation is around 11.8%. The mining industry is dependent heavily on manpower and the wage revision for workers is due from 01.01.2012 for non executives. It may please be noted that Increase in pay due to wage revision @ 5% will result in increase by more than Rs 100 crore and if considered @30% it will be more than Rs.300 crore per annum, whereas, only 5% increase has been provided as liability in the books of account upto 31.03.2014. This factor alone will result in additional increase on O & M cost ranging from 3.94% to 11.65% for corresponding 5% to 30% wage increase respectively.



Since equipments deployed in Mine-I and IA and Mine-II are ageing, increased maintenance and replacement of equipment spares are required. Due to increase in length and area of mines and ageing of equipment additional expenditure has to be incurred in maintaining additional conveyor, civil and auxiliary equipment, road and GWC.

Further, the wages of Contract workers have been revised from 01.11.2014 by around 30% for which NLC made all out efforts to persuade the unions to the maximum and in the process faced strike by the contract workers. The wage revision of workers will have its huge impact on the O&M costs during the current tariff period also.

Hence it is requested to increase the existing escalation percentage in proposed guidelines effective 2014-19 from 11.5% to 13%.

(vi) Over Burden Removal expenses :-

In the proposed guidelines, the O&M expenditure is exclusive of OB removal only to the extent it is outsourced at Neyveli. However, the same will be trued up at the beginning of the next tariff period. So there is no double recovery.

More OB outsourcing is required to be carried out due to adverse OB - lignite ratio to excavate same quantity of lignite. The actual excavation is nearly 10% to 20% higher than norm in FR. This is not built up in the escalation for O & M.

Based on the inputs given by consultant and in-house study, an estimated amount of Rs 400 crore is required to be incurred for the Mines during the next three years. It is purely on account of additional unfavourable stripping ratio.

If the additional OB removal is contemplated with the purchase of additional sets of machineries and equipment, the cost of excavation will be three to four times higher compared to the OB outsourcing.

The cost of OB outsourcing will be included in the pricing based on Planning requirement and would be trued up at the beginning of the next tariff period

(vii) Components of Working Capital:-

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In some areas, thickness of lignite seam gets reduced and even wash out in some areas is encountered. Further, in monsoon times (for the period October to December) production in Mines suffer heavily and moisture will be more due to wet



conditions. Hence, to meet the requirement of Lignite for uninterrupted operation of Thermal stations, it is essential to maintain the stock of Lignite at pithead over and above the stock applicable for thermal generating station. Otherwise, we may have to use more oil which is costlier. Stock of lignite is also necessary to deal with additional requirements of power stations at times, to continue operations in the event of strike or any outside disruptions, during monsoon etc.

Thus it is proposed to include one month stock in the working capital in addition to the existing components

(viii) Interest on Working Capital:-

The proposed change in the interest rate for working capital is in line with CERC Regulations only.

(ix) Interest on Loan:-

No change in the funding pattern is proposed in the new guidelines. It is the same as provided in previous MOC guidelines for 2009-14. This is also in line with CERC Regulation for 2009-14 and 2014-19.

(x) Return on Equity:-

Corporate Income Tax rate applicable to the core business of mining as on 01.04.2014 may be adopted and grossed up. The same shall be trued up at the beginning of the next tariff period.

The lignite mining is not able to evolve over the years due to limited reserves, limited technology options and heavy dependence on OEMs which make the operations less cost effective as compared to power generation. Therefore, we may continue to give return on equity on the same lines as was being given in Power Generation in last tariff period.

(xi) Foreign Exchange Rate Variation (FERV):-

FERV is not claimed as equity. Though upfront loading is proposed, the suggestion of KSEB to regulate as per CERC regulation is acceptable.



(xii) Statutory Payments:-

Taxes and duties levied on lignite alone are claimed. There is no double claim.

As per CERC Regulation, landed cost of fuel adopted for computation of energy charges includes applicable Taxes and duties, Royalty etc.

Demand for EC Tax is being made by the concerned tax authorities and in the event of levy of EC Tax, the same shall be charged to EBs.

(xiii) Mine Closure Expenses:-

The applicable Mine closure Expenditure as per the Govt. Notification only will be claimed.

(xiv) Surcharge / interest on delayed payments:-

Surcharge / interest @ 1.5% pm in line with CERC regulation is proposed to be made applicable for outside sale of lignite for existing and future contracts and not applicable to EBs/Discoms since the lignite price is claimed through power tariff.

(xv) Adjustment of Receipts:-

Priority for adjustment of surcharge / interest, arrears and then regular monthly bills in line with industry practice is proposed to be made applicable for outside sale of lignite for existing and future contracts. This arrangement is not applicable to EBs / Discoms since the lignite price is claimed through power tariff.

Hearing

- **5.** In order to appreciate the respective parties' contentions in its entirety, a hearing was held on 30.12.2014 at 3.30 pm, with Additional Secretary, Ministry of Coal in Chair in which representatives of NLC and Beneficiaries SEBs attended and presented their cases. The list of participants is enclosed as Annexure I.
- 6. A presentation was made by NLC in which it was informed that unlike power generation, Lignite mining was faced with various adverse factors such as difficulties in Land Acquisition, unfavourable stripping ratios, reduced lignite seam thickness, wash out phenomenon, heavy dependence on OEMs for repairs and maintenance of mining equipments, challenges in continuous management of water pressure, cyclone prone location, highly labour intensive work etc. NLC has recently faced the contract workmen strike and against their demand of increasing the wages by 200%.





after prolonged negotiations agreed for a hike around 30%. Pay revision of regular workers is also due weef 01.01.2012 which has a bearing in the 2009-14 tariff period also. NLC is awaiting the CERC order for Mine II Expansion pooling petition based on which truing up claim for lignite price will be submitted. NLC proposal includes only bare minimum changes from the existing guidelines which makes the pricing of lignite in line with business requirements, regulation in power sector and industry practices for payment terms. The proposed changes will have minimum impact on the lignite price. It was further informed that inspite of all these adversities, NLC is able to supply power at the most competitive rates and increase in lignite price is marginal. It was further informed that NLC proposal was for retaining the earlier guidelines and only with the following changes in the parameters:

- (i) Lesser capacity utilization of 78% for Barsingsar Mines
- (ii) Increase in Annual escalation rate of O & M from 11.5% to 13%
- (iii) Outsourcing of additional OB removal as a separate expense
- (iv) Allowing Wage Revision impact separately at actual
- (v) Inclusion of One month lignite stock in working capital
- (vi) Interest rate SBI Base Rate plus 350 bps instead of Prime Lending Rate (PLR) in line with CERC guidelines
- (vii) Surcharge and Payment mechanism primarily for outside to TAQA (IPP)
- 7. Representative from KSEBL reiterated the points raised in its letter dated 30.10.2014. Deliberations were held on various parameters of guidelines and pointwise replies were given by NLC representatives.
- 8. After taking into accounts the extant guidelines/order, the written submissions given by TANGEDCO, KSEBL, PCKL and response of NLC, Power point presentation and detailed deliberations in the meeting and also keeping in view, these imperatives that:-
- (i) NLC should continue to perform well in the overall interest of all stake holders.
- (ii) The pricing should be reasonable and fair and principles adopted should be rational and equitable
- (iii) Norms adopted should promote and encourage efficiency, the following guidelines are hereby issued for the tariff period 2014-19 effective from 01.04.2014:-

(i) Capacity Utilization:

No.

In line with earlier BPSA entered into between NLC and beneficiaries / previous guidelines the normative capacity utilization for Neyveli mines was kept at 85%.



Considering the difficulties encountered in mining and also the past achievement of less than 85% Capacity utilisation, it shall continue to be 85%. However, considering the lower requirement of lignite to meet the generation of power by Barsingsar Thermal and most of the mining activity is outsourced the capacity utilization for Barsingsar Mines shall be 78%.

(ii) Funding pattern-Debt Equity Ratio:

In line with the earlier guidelines, Net Fixed Assets Methodology with actual funding pattern shall be adopted for old mines i.e. Mine-I and Mine-I Expansion, Mine-IA and Mine-II.

Gross Block Methodology with 70: 30 Debt Equity Ratio shall be adopted for Mine-II Expansion and Barsingsar Mine and other projects that would be declared under commercial operation on or after 1.4.2014. If the Equity investment is more than 30%, the Equity in excess of 30% will be treated as normative loan. If the equity deployed is less than 30% of the capital cost, actual equity will be considered for determination of tariff.

(iii) Additional capitalization:

Considering the lower life of auxiliary equipments, additional requirement of conveyors, roads, GWC equipments and also rejuvenation of SMEs, Capital additions based on annual budget/plans shall be taken for calculating this parameter and the same will be trued up at the beginning of the next tariff period.

(iv) Depreciation:

For equipments/machinery other than Specialized Mining Equipment (SME), depreciation shall be charged as per the provisions of the Companies Act 2013. The rates of depreciation notified by Ministry of Corporate Affairs vide its letter No.45/G/2006-CL-III dt 29.08.2007 shall be adopted for Specialized Mining equipments acquired on or after that date.

(v) O&M expenses:

Considering the impact of wage revision which cannot be quantified at this stage and adverse stripping ratios of OB beyond the normative level as considered in FR necessitating outsourcing, these factors shall not be part of normal O&M expenditure. Moreover, in the absence of truing up claim of lignite by NLC for 2009-14, the proposal of NLC to enhance escalation from 11.5% to 13% is not agreeable. Therefore, the prevailing rate of 11.5% shall continue.





Actual O&M Expenses (excluding expenditure incurred on OB removal at Neyveli through outsourcing) incurred in 2013-14 with 11.5% escalation shall be the base O&M for 2014-15 and thereafter escalated at 11.5% p.a. The same will be trued up at the beginning of the next tariff period.

In Barsingsar, major activity of mining is carried out through outsourcing. O&M expenditure of Barsingsar including QB outsourcing shall continue to be escalated at 11.5%. The actual expenditure incurred during 2013-14 with the above escalation shall be the base O&M for 2014-15 and the same shall be trued up at the beginning of the next tariff period.

In the case of new mines, O&M expenditure for the first year after the COD shall be determined based on the project Cost / RCE as approved by GOI / Board of Directors of the Company.

As the impact of Wage revision of workers from 01.01.2012 cannot be quantified and included in the tariff at this point of time. Hence, as and when the same is finlalised, NLC shall claim at actuals. However, NLC shall take maximum care at the time of negotiation with workmen unions to keep the wage increase to the minimum.

(vi) Expenditure on outsourcing Over Burden Removal:

OB removal which is outsourced in Neyveli Mines shall be allowed as a separate item based on budget approved by Board of Directors of NLC. This expenditure shall be trued up in the beginning of the next tariff period.

(vii) Components of Working capital:

Keeping in view the lignite stock of 15 days allowed by CERC for thermal stations and at the same time considering the requirement of lignite during monsoon period and also during exigencies like strike and in order to have uninterrupted supply of lignite to Thermal Stations, the inventory of lignite in mines shall be restricted to 20 days production at normative capacity of mines against the proposal of NLC for considering 30 days. Therefore, the working capital shall cover:

- i) One month Operation & Maintenance Expenses
- ii) 12 months Consumption of Spares
- iii) 20 days Lignite stock at cost as on 31st March of the preceding year



(viii) Interest on Working Capital

The rate of interest on working capital shall be on normative basis and shall be considered at the base rate of SBI as on 1st April 2014 plus 350 basis points.

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(ix) Interest on Loan

For mines for which price is determined on Gross Block Method, the rate of interest shall be the weighted average rate of interest calculated on the basis of actual portfolio. If there is no actual loan for a particular year but normative loan is still outstanding, the last available weighted average rate of interest shall be considered.

The interest on loan shall be calculated on the normative average loan of the year by applying the weighted average rate of interest.

Normative loan outstanding as on 1.4.2014 shall be worked out by deducting cumulative repayments considered for lignite pricing up to 31.03.2014 from the Gross Normative Loan.

The repayment for each year of the pricing period 2014-19 shall be deemed to be equal to the depreciation allowed for the corresponding year / period.

Under Net Fixed Asset method, interest on loan shall be at actuals.

(x) Return on Equity:

Return on equity shall be 15.50% grossed up with Corporate Income Tax rate. The grossing up based on respective year Income Tax rate shall be made on year to year basis. In addition, incentive of 0.5% ROE will be allowed if the new mining project is commissioned within the scheduled date. In case, the linked power plant is not commissioned, this incentive will not be allowed.

(xi) Foreign Exchange Rate Variation (FERV):

The extra rupee liability towards interest payment and loan repayment in respect of Foreign currency loan shall be permissible in the year of payment.

(xii) Statutory payments:

Statutory payments viz., Clean Energy Cess, Royalty, Excise Duty, Electricity consumption tax or any other tax as notified by the Central/State Government shall be charged based on actual.

(xiii) Mine Closure expenses:

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Mine closure expenses are to be allowed as per the annual Mine Closure Cost calculated based on the guideline issued from time to time by MoC in this regard.



(xiv) Surcharge / Interest on delayed Payments:

Since, lignite price is claimed from EBs / Discoms as a part of the power tariff so this is not applicable to them. However, surcharge / interest on late payment beyond due date shall be in line with power Industry at the rate of 1.5% per month in all cases of lignite sale for existing and future contracts.

(xv) Adjustment of Receipts:

Since, lignite price is claimed from EBs / Discoms as a part of the power tariff so this is not applicable to them. However, in cases of lignite sale for existing and future contracts, receipts shall be appropriated in the following order of priority:

- i. Late payment surcharge, if any
- ii. Arrear bills, if any
- iii. Statutory dues in the current bills,
- iv. Other charges in the current bill
- **9.** Neyveli Lignite Corporation is accordingly directed to workout the transfer price of lignite for the period 2014-19, in the light of the above guidelines and inform CERC and other concerned parties.

(Kishore Kumar)

Under Secretary to the Govt. of India

Copy to:-

- 1. The CMD, NLC, Neyvelli, Tamil Nadu,
- 2. The beneficiary SEBs as per the list.



List of the participantS in the hearing on the issues of fixation of transfer price of lignite held on **3**0.12.2014 at 3:30 P.M.

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- 1. B. Surender Mohan, CMD, NLC
- 2. Rakesh Kumar, Director (Finance), NLC
- 3. Subir Das, Director (Mines)
- 4. R. Mohan, CGM (F), NLC
- 5. A. Ganesan, GM(F)/TS to CMD
- 6. W.S.J. Danial DGM (F), NLC
- 7. Bipinsankar, DYCE (KSEBL).



BENEFICIARY STATE ELECTRICITY BOARDS

	Hw CMD.		. The Managing Director.
	Japur Vidyut Vitaran Nigam 1.td.		- Jodhpur Vidyut Vitaran Nigam Lad
:	- Vidyut bhavan, 1° floor, Janpath.		New Power House, Heavy indl. Area
	Jaipur, Rajasthan 302005	4	Jodhpur, Rajasthan 342063.
.	The Managing Director.	-1	The Superintending Lugineer (1000)
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7.	the CMD.	6.	† The CMD. † TS DISCOMS.
	Keraia State Electricity Board Itd.,		· · · · · · · · · · · · · · · · · · ·
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٠٠.	the Managing Director.	10	The Managing Director.
	Bangalore Electric Supply Company Ltd.		MESCOM, Paradigm Plaza.
	32.1-2 Crescent Towers.	٠	· Pandeswara.
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::.	The Managing Director.	12	- The Chairman.
	- CHESCO.	i	: Tamil Nada Electrichy Board.
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- 1	Like Managing Director.	!	· The CMC.
	HESCOM.		. APTRANSCO.
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	10:61:58002:	:	Hyderabad #100 082
15.	Lie Managing Director.	16.	Devlopment Commissione/
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	Room No. 501.5" floor, KPTCL Building.		Covernment of Pondicherd . A)
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	Bangatore 366 (99)		Pondicherry 60f 607.7
	The Director.		19311
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