

Before the
MAHARASHTRA ELECTRICITY REGULATORY COMMISSION
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Case No. 85 of 2017

In the matter of

**Petition of Maharashtra State Electricity Distribution Co. Ltd. for amendment of
Banking provisions of Distribution Open Access Regulations, 2016**

Coram

**Shri Azeez M. Khan, Member
Shri Deepak Lad, Member**

Maharashtra State Electricity Distribution Co. Ltd.

.....Petitioner

Appearance:

For the Petitioner

: Shri Ashish Singh (Adv.)
: Shri A. W. Mahajan

ORDER

Dated: 27 March, 2018

Maharashtra State Electricity Distribution Co. Ltd (MSEDCL) has filed a Petition for amendment of Regulation 20 of the MERC (Distribution Open Access) Regulations ('DOA Regulations'), 2016 on 23 May, 2017 which relates to the provisions for to banking of Renewable Energy (RE).

2. MSEDCL's prayers are as follows:

- (a) *"To admit the Petition as per the provisions of the Regulations 36 and 37 of the MERC (Distribution Open Access) Regulations 2016;*
- (b) *To amend the Regulation 20 of MERC (Distribution Open Access) Regulations 2016 and also allow the sub-sequent amendments in Regulations by virtue of proposed Regulations...."*

3. The Petition states as follows:

- 3.1 The Commission notified the DOA Regulations, 2016 on 30 March, 2016. The Regulations allow 'banking' of RE generation inspite of MSEDCL's concerns raised in its submission dated 31 October 2015 during the public consultation process on the Draft Regulations. Therefore, MSEDCL has approached the Commission for amendments to Regulation 20.
- 3.2 Regulation 20 provides for the banking of RE generation. As per the Regulation, surplus energy from a non-firm RE Generating Station, after set-off, shall be banked with the Distribution Licensee.
- 3.3 By virtue of the Regulations, the infirm RE Generators are availing the following benefits over firm energy sources:
- a) Exemption from scheduling,
 - b) Monthly Time-of-Day (ToD)-wise banking facility,
 - c) Yearly ToD-wise banking facility.
- 3.4 The 'banking' provision allows RE Generators to inject surplus power into the grid when the power cost is less and draw back power for consumption during the peak period when the power cost is high, which in turn puts an additional financial burden on the Distribution Licensee, which in turn is passed on to the common consumers of MSEDCL. Very few consumers who are using Open Access (OA) through RE and taking benefit of banking are getting benefited from the provision of banking at the cost of common consumers.
- 3.5 The RE generation from Wind Generators is at the peak in the months of June to September in a calendar year, and particularly in the night hours when MSEDCL's Demand is minimum. The market price of the power is least/ minimum during these months. During this period, the consumer/Generator banks the surplus energy injected into the grid and draws it back from the grid in the months when MSEDCL's own demand and power purchase cost is high. MSEDCL's common consumers have to bear this difference in the cost of power which in turn is passed on to other common consumers.
- 3.6 MSEDCL has tied up about 5,500 MW of thermal power through competitive bidding and is already in surplus. It is also expected to get an additional 10,000 MW from Central and State Generating Stations in the next 4-5 years. In this situation, due to further over-injection from RE sources, MSEDCL has to back down the thermal generation to the extent of these banked units and has to bear the fixed charges payable to the Thermal Generators. The power backing down scenario is as follows:

A) The total contracted capacity of MSEDCL (FY 2016-17) is as below:

Sr. No.	Source	Capacity in MW
1	Thermal	10370
2	Hydro	2585
3	Gas	672
4	Central Sector	5778
5	Renewable (Including Solar, biomass, bagasse, SHP)	5219
6	Total	24628

3.7 The following data shows that the RE Injection MUs and MSEDCL backed down MUs are nearly matching:

Month	Apr 16	May 16	June'16	Jul 16	Aug 16	Sept 16	Oct 16	Nov 16	Dec 16	Jan 17	Feb 17	Mar 17
MSEDCL Max Demand in MW	17411	17176	16779	13830	16063	17881	18013	18116	17764	18283	18830	19745
RE Injection in MUs	663	891	917	1044	1055	640	373	531	742	719	-	-
MSEDCL Back down in MUs	358	599	1046	1134	807	1082	696	946	907	798	305	421

3.8 MSEDCL has worked out the actual difference between the variable cost of power at the time of banking of surplus units that is lowest variable cost of backed down power and at the time of utilization of this banked units that is highest variable cost of on-bar power or Indian Energy Exchange (IEX), whichever is higher, in each 15 min. time slot in April, 2016 to March, 2017 considering banked units of all consumers availing the banking facility.

3.9 The sample working sheets for July, 2016 are attached to the Petition. The total difference works out to Rs. 11.02 crore for the full year. That much loss has been caused to MSEDCL's consumers by only 228 consumers taking banking facility:

Over-injection Details			Total Cost at Credit (Rs. Crs)	Difference in Rs. Crs. (Cost at Credit - Cost at Banking)
Month	Units in Mus	Cost at Banking in Rs. Crs.		
APR-2016	9.24	2.33	2.57	0.25
MAY-2016	26.15	5.81	7.38	1.57
JUN-2016	29.67	6.24	8.11	1.88

JUL-2016	32.35	5.43	8.49	3.06
AUG-2016	28.20	5.11	7.46	2.34
SEP-2016	10.78	2.00	2.95	0.95
OCT-2016	4.57	0.95	1.11	0.16
NOV-2016	5.38	1.19	1.48	0.29
DEC-2016	5.56	1.25	1.53	0.28
JAN-2017	2.57	0.61	0.73	0.12
FEB-2017	2.79	0.75	0.81	0.07
MAR-2017	3.06	0.84	0.91	0.07
TOTAL	160.33	32.5	43.53	11.02

In the above Table, out of 160.33 MUs, 72.58 MUs are adjusted through ToD adjustment and 87.75 MUs are adjusted through credit in subsequent months (except April, May, October and November).

3.10 The methodology adopted by MSEDCL is as under:

- i. The injection and credit of units to OA consumers are first adjusted in 15 minutes time block (adjustment in terms of units).
- ii. The surplus units injected in every 15 minutes time block are banked at lowest variable cost of backed down power in that 15 minutes time block.
- iii. The credit of banked units to OA consumer through ToD adjustment in the same month or through adjustment in subsequent months is calculated in terms of cost, i.e. at highest variable on-bar cost or cost of purchase through IEX, whichever is higher in that 15 min time block.
- iv. The banking of units is done at the lowest variable cost of backed down power in every 15 minutes time block, as most of the generation is during off-peak season. Due to injection of surplus power in grid (for which MSEDCL has no Energy Purchase Agreement (EPA)), MSEDCL has to back down its own generation by paying the fixed charges.
- v. The credit of units is done at the highest variable cost of on-bar power in every 15 minutes time block, as most of the credit is during the peak season. MSEDCL has to procure additional expensive power to fulfill the banking obligation. The month-wise details of banked units and offset units are as under:

<u>Month</u>	<u>Current Month Banked units in Mus</u>	<u>Previous Banked Offset Units in MUs</u>
Apr-16	9.57	0.00
May-16	11.40	0.00
Jun-16	23.86	7.75
Jul-16	31.44	7.72
Aug-16	29.69	8.63
Sep-16	10.72	17.64
Oct-16	0.59	0.00
Nov-16	1.59	0.00
Dec-16	3.87	20.00
Jan-17	0.67	15.72
Feb-17	0.80	5.92
Mar-17	0.80	4.36
<u>Total</u>	<u>125.00</u>	<u>87.75</u>

From the above, it is evident that maximum units are banked during off-peak season and credit is availed during peak season. High Tension (HT) sales of MSEDCL from December to March are reduced by 46 MUs due to offset of units banked during off-peak season. This has a direct financial impact of Rs. 40 crore considering Average Billing Rate (ABR) of Rs. 8.57 per unit for HT industrial consumers for FY 2016-17.

- vi. By providing the banking facility in terms of currency settlement, MSEDCL will be revenue neutral.
- vii. The calculation has been carried out through IT programming and can be shared with the Commission for verification.

3.11 Extending this concessional promotional benefit of banking will affect not only the common consumers but also the financial position of MSEDCL, and hence the concessional / promotional benefit of banking facility may be changed to make it revenue neutral to both consumers availing banking and MSEDCL and its consumers.

3.12 The banking facility in some states such as of Gujarat, Rajasthan and Karnataka is on monthly basis as below:

<u>S. No.</u>	<u>Criteria</u>	<u>Gujarat</u>	<u>Rajasthan</u>	<u>Karnataka</u>
1	Eligibility	Only Captive	Only captive	All
2	Period	Monthly basis	Monthly basis	1. Monthly basis for captive under REC. 2. Yearly for others
3	Credit	Credit in same month only in terms of ToD adjustment	Credit in same month only in terms of ToD adjustment	Credit in same month for captive under REC. yearly for non REC captive and third party
4	Conditions	NIL	NIL	NIL
5	Purchase	1. NON REC: 85% of feed in tariff. 2. REC : @APPC	Balance 10% at 60% of IND Tariff	Unutilized energy @ 85% of feed in tariff

Thus the seasonal variation in the prices of energy does not burden the Distribution Licensee and its common consumers.

3.13 MSEDCL's proposal is for a banking methodology of infirm RE to make it revenue neutral, instead of providing the banking in terms of MUs:

Step 1: The surplus banked units from the RE sources in a month shall be treated as banked in terms of Rupees (currency terms) by MSEDCL at the lowest variable cost of power purchase for respective 15 minutes time slot of month.

Step 2: The consumer may avail these banked units in the subsequent months by paying the difference between variable cost, i.e. lowest variable cost of backed down power at the time of banking, and highest variable cost of on-bar power at the time of utilization of units.

Step 3: The unutilized banked energy at the end of the financial year, limited to 10% of the actual total generation by such RE Generator in such financial year, shall be considered as deemed purchase by the Distribution Licensee at its lowest variable power purchase cost for that year and such power shall be eligible for Renewable Energy Certificate (REC) and Renewable Purchase Obligation (RPO).

3.14 With the proposed amendments, the OA consumers sourcing power from infirm RE sources can avail the banking facility without additional financial burden on MSEDCL, which in turn will benefit its consumers.

4. At the hearing held on 27 July, 2017:

4.1 MSEDCL stated that:

- (i) It has filed the Petition for removal of difficulties in implementation of DOA Regulations, 2016 relating to the provisions of banking.
- (ii) Regulation 20 of the DOA Regulations 2016 provides for the banking of RE generation. As per the present mechanism, the energy injected from a non-firm RE Generating Station shall be banked with the Distribution Licensee after set-off with consumption/withdrawal of units in energy (kWh) terms. Also, withdrawals of banked units are not allowed in certain months.
- (iii) MSEDCL proposes a new mechanism to provide banking of RE in terms of Rupees in absolute terms instead of in terms of energy (kWh) units. The banked Rupees currency unit shall be considered at the lowest variable cost of power purchase for respective 15 minutes time slots of a month. The consumer may avail these banked units in the subsequent months by paying the difference between the variable cost, i.e. lowest variable cost of backed down power at the time of banking, and the highest variable cost of on-bar power at the time of utilization of units.

4.2 To a query of the Commission, MSEDCL stated that it would file a detailed additional submission on the exact dispensation required for banking. The additional submission would also cover the restrictions on withdrawal of banked energy for 4 months, peak and off peak TOD slots, banking arrangements, etc.

4.3 The Commission observed that it has received 14 representations from various consumers/RE Generators seeking permission to file their objections and requesting a copy of the Petition. The Commission clarified that, if it is prima facie satisfied regarding the need for amendment of the Regulations, it would have to undertake a public consultation process in which the representationists would also have the opportunity to make their suggestions. Amendment of Regulations cannot be done through an Order, and hence there is no need to file Intervention Applications in the matter. The Applicants accordingly did not press the matter, but sought a copy of the Petition. MSEDCL stated that it would upload its Petition on its website, and provide a copy to the Applicants also.

4.4 The Commission directed MSEDCL to file its additional submission within three weeks and upload it along with its Petition on its website

5. Prayas (Energy Group) ('Prayas'), an Authorised Consumer Representative, vide its submission dated 20 September, 2017, has stated as follows:

5.1 Prayas broadly agrees with MSEDCL's approach of linking energy banking with the actual Merit Order Dispatch (MOD) of the Distribution Licensee. It agrees with the need to have a banking mechanism that is based on the difference between power purchase cost at the time of banking of energy and its drawal which is revenue

neutral to both MSEDCL and the consumers eligible for banking. Some modifications are suggested as below:

- (i) The highest variable cost of on-bar power should mean ‘the highest variable cost of the dispatched power (incl. any power bought from Exchanges)’. If this interpretation is correct, Prayas is in agreement with the MSEDCL proposal on this aspect of valuing drawal energy.
- (ii) The proposed framework for valuing banked and un-banked energy is a good starting point, especially with low level of RE-based OA. However, as the quantum of banking by RE-based OA increases in the future, a better framework may become necessary. One possibility could be as follows:

The banked energy could be valued at the weighted average variable cost of the backed down Generators due to total banked RE OA quantum. Similarly, at the time of drawal, the same energy can be valued at weighted average variable cost of additional Generators which are dispatched. The renewable OA consumer availing banking should be required to pay the difference between these weighted average costs. Such a framework would be more accurate in estimating the banking charges, especially if more than one Generating Unit is backed down or dispatched due to banking/unbanking.

- (iii) Since the banked energy is fully valued both at the time of banking and drawal, there should not be any seasonal or ToD-based constraints on the drawal of the banked energy unless there are network constraints. This has also been proposed by MSEDCL in its additional submission.
- (iv) However, going against the above principle, MSEDCL has proposed to limit energy banking to only one month, effectively putting a stop to RE-based OA. Instead, energy banking should be allowed for the whole year, as in Solar Net Metering. This is necessary since there is a strong seasonal element to Wind and Solar generation profiles.
- (v) The credit for energy banking and charges for drawal should be calculated for each 15 minute block and would be commercially settled at the end of the month. Such monthly settlement will also avoid the need for specifying any buy-back rate for excess power banked with the Distribution Licensee at the end of the year as was needed in the erstwhile banking provision. MSEDCL and the RE OA consumer should directly settle the surplus/deficit in commercial terms at the end of the year. However, the green attribute of un-utilised banked energy at the end of the year should be credited to MSEDCL’s RPO.

- (vi) Since Wind and Solar power have relatively low Capacity Utilisation Factors (CUFs) (20-30%), OA consumers may seek OA permission for generation capacity greater than their stated drawal requirement. However, to ensure that the energy banking service provided by MSEDCL is not misused, there is a need to cap the maximum renewable generation capacity that can be procured in relation to the Contract Demand. A principle which can be considered for this is that the RE capacity contracted should be such that there is no significant excess generation (say up to 10%) over the yearly energy demand of the consumer.
- (vii) Regulation 16.3 of the DOA Regulations, 2016, provides that RE Generating Plants identified as 'non-firm power' under the Commission's Regulations governing RE Tariff shall be exempted from scheduling till such time as the Commission stipulates or specifies otherwise. However the lack of scheduling by such RE Generating Plants selling power under OA may cause difficulties in the day-ahead power purchase planning of the Distribution Licensee. Hence, with the proposed facilitating banking mechanism, the Commission should finalize and implement the Forecasting, Scheduling and Deviation Settlement Regulations for Wind and Solar Generators as soon as possible.
- (viii) Linking the banking charge to MOD of the Distribution Licensee will also enable the market to compare the cost of flexibility and value addition by other options such as grid level storage, demand response, demand aggregation etc.

6. In its further submission dated 20 September, 2017, MSEDCL stated that :

6.1 The following mechanism for banking of infirm RE power is being suggested by MSEDCL so that there will not be adverse financial impact and it remains revenue neutral:

- (i) The surplus banked units from the RE sources in a month shall be treated as banked in terms of Rupees (currency) at the lowest variable cost of backed down power for respective 15 minutes time slot of month.
- (ii) The consumer may avail these banked units in the same month by paying the difference between variable cost, i.e. lowest variable cost of backed down power at the time of banking, and highest variable cost of on-bar power at the time of utilization of units.
- (iii) The unutilized banked energy at the end of the month, limited to 10% of the actual total generation by such RE Generator in such month, shall be considered as deemed purchase by the Distribution Licensee at its lowest variable power purchase cost for that month, and such power shall be eligible for RPO. Unutilized banked energy in excess of 10% shall lapse.

6.2 MSEDCL's suggestions regarding the present dispensation provided by the Regulations are to balance the equities. The following dispensation is provided in Regulation 20.4 so as to balance the equities:

“Provided that the credit for banked energy shall not be permitted during the months of April, May, October and November, and the credit for energy banked in other months shall be as per the energy injected in the respective Time of Day ('TOD') slots;

Provided further that the energy banked during peak TOD slots may also be drawn during off-peak TOD slots, but the energy banked during off-peak TOD slots may not be drawn during peak TOD slots.”

6.3 If the banking mechanism as proposed by MSEDCL is accepted, then the provisos to Regulation 20.4 may not be necessary and can be repealed. The infirm RE may also be banked and drawn during the months of April, May, October and November. Also, the energy banked in any 15 minutes time slot of the day (peak or off peak) may be drawn during in any 15 minutes time slot of the day (peak or off peak) in terms of rupees currency as proposed by MSEDCL in this Petition.

6.4 MSEDCL has proposed the above alternative mechanism for banking based on the study and financial implications which have been observed in the recent past. Electricity being a dynamic and an ever-evolving subject poses new and emerging challenges every day and needs new mechanisms to minimize the ambit of foul play and preserving equities of all the stakeholders.

7. At the hearing held on 21 September, 2017:

7.1 MSEDCL stated that:

- (i) Pursuant to the last hearing, MSEDCL has filed its submission and has uploaded the Petition on its website.
- (ii) MSEDCL proposes a new mechanism to provide banking to RE sources in terms of Rupees in absolute terms instead of in terms of Energy (kWh) units. The banked Rupees currency units shall be considered at the lowest variable cost of power purchase for respective 15 minutes time slots of a month. The consumer may avail these banked units in the subsequent months by paying the difference between the variable cost, i.e. lowest variable cost of backed down power at the time of banking, and the highest variable cost of on-bar power at the time of utilization of the units.
- (iii) Prayas has also submitted its comments supporting MSEDCL's approach.
- (iv) The 10% surplus energy may be purchased every month instead of on annual basis, and may be allowed against the RPO of the Distribution Licensee.

- (v) Restriction on banking facility during 4 months of the year may also be not required if banking facility is provided in Rupee terms instead of kWh terms.

7.2 To a query of the Commission, MSEDCL stated that it agrees that the calculations of lowest variable cost of backed down power at the time of banking would be complex. The intention of suggesting such mechanism is that MSEDCL would be revenue neutral. MSEDCL is not against the banking facility.

Commission's Analysis and Ruling

8. **Banking of non-firm RE in one form or the other was formally provided under policy dispensations of the Govt. of India, Govt. of Maharashtra and the erstwhile Maharashtra State Electricity Board from the 1990s, well before the Commission was established. The current DOA Regulations, 2016 were notified by the Commission after a due process of public consultation, and provide as follows with regard to banking:**

“2.1(4) “Banking” means the surplus Renewable Energy injected in the grid and credited with the Distribution Licensee after set off with consumption in the same Time of Day slot as specified in Regulation 20...

...20.1 Regulation 19.3 shall not be applicable in case Open Access consumer obtains supply from a Renewable Energy Generating Station identified as ‘non-firm power’ by the Commission in its Regulations governing the Tariff for Renewable Energy.

20.2 The surplus energy from a ‘non-firm’ Renewable Energy Generating Station after set-off shall be banked with the Distribution Licensee.

20.3 The banking year shall be the financial year from April to March.

20.4. Banking of energy shall be permitted during all twelve months of the year:

Provided that the credit for banked energy shall not be permitted during the months of April, May, October and November, and the credit for energy banked in other months shall be as per the energy injected in the respective Time of Day (‘TOD’) slots determined by the Commission in its Orders determining the Tariffs of the Distribution Licensees;

Provided further that the energy banked during peak TOD slots may also be drawn during off-peak TOD slots, but the energy banked during off-peak TOD slots may not be drawn during peak TOD slots...

20.5. Banking charges shall be adjusted in kind @ 2% of the energy banked.

20.6. The unutilised banked energy at the end of the financial year, limited to 10% of the actual total generation by such Renewable Energy generator in such

financial year, shall be considered as deemed purchase by the Distribution Licensee at its Pooled Cost of Power Purchase for that year:

Provided that such deemed purchase shall not be counted towards the Renewable Purchase Obligation of the Distribution Licensee, and the Generating Station would be entitled to Renewable Energy Certificates to that extent.”

9. **The Commission notes in passing that, by MSEDCL’s own computations, the total quantum of banked energy is marginal as a proportion of its total power procurement, and it has estimated the financial impact as Rs. 11.02 crore in FY 2016-17. Apart from a negligible impact on consumer tariffs, these estimations are based on partial assumptions and do not fully reflect all aspects of the impact of the banked energy, including in favour of MSEDCL in four high-demand months, or other relevant aspects. Moreover, backing down of contracted generation is on account of many factors apart from RE injection. The Table at para. 3.7 is not meaningful to that extent. Moreover, that Table itself shows that, even in the low wind months of April and May and October onwards, the backing down by MSEDCL has been substantially higher or lower than the RE injected.**

10. **MSEDCL has sought amendment of Regulation 20 of the DOA Regulations, 2016, essentially to do away with the existing ToD-based banking provisions applicable to non-firm RE. MSEDCL has proposed a banking facility in terms of ‘currency settlement’ instead of ‘energy settlement in kind’. The rate proposed for such ‘currency based settlement’ is the lowest variable cost of backed-down power in each 15-minute time block for the surplus banked power; and the credit for drawal of banked energy is proposed at the highest variable on-bar cost or cost of power purchase through the Power Exchanges, whichever is higher. In effect, MSEDCL proposes to do away with ToD-based adjustment in kind and to undertake the commercial settlement for such wheeling transactions in each 15-minute time block in monetary terms. This would be in addition to the wheeling charges, wheeling losses, banking charges, Cross-Subsidy Surcharge and Additional Surcharge, if any, to which the Distribution Licensee is separately entitled in any case.**

11. **If the accounting and credit of energy is to be undertaken in monetary terms for each 15-minute time block, it would be more appropriate to track the cost of deviation (schedule vs. actual) at both ends (i.e., the injection end and the drawal end) since there would continue to be deviations at both ends irrespective of backing down or otherwise. Deviations at the injection end will continue due to the very nature of variable RE generation but can be minimised by better forecasting, scheduling and a deviation settlement mechanism (DSM). For this purpose, the Commission has recently issued draft Forecasting, Scheduling and DSM Regulations for Solar and Wind generation for public consultation. Deviations at the drawal end have to be seen in the context of the deviation treatment proposed**

for partial OA consumers. As most of these are embedded consumers, their demand forecast is in any case a part of the aggregate demand forecast of the Distribution Licensee, and any variation is supplied by it and accounted for and compensated through the consumer category-wise tariffs.

12. Banking, on the other hand, is the energy credit adjustment of actual injection vis-à-vis the actual drawal by the consumer over a period. Banking is provided for non-firm RE considering the variable nature of such generation, but with appropriate qualifications to address the interests and concerns of both the Distribution Licensee and the consumer. In the DOA Regulations, 2016, these qualifications include ToD-based banking with adjustment of surplus injection of higher ToD slabs (peak) to lower ToD slabs (normal/off-peak), but not vice-versa; monthly carry-forward of surplus banked energy to annual settlement, but capped at 10% of total generation at the end of the year; restriction on banking credits for 4 months (viz. April, May, October and November, generally the peak demand months, as explained in the Statement of Reasons for the Regulations); levy of banking charges; etc. In the case of MSEDCL, Additional Surcharge in lieu of stranded capacity due to backing down is also being levied on RE OA wheeling transactions.

13. As regards counting of the surplus RE (upto 10%) at the end of the year against the RPO of the Distribution Licensee, MSEDCL may refer to the Commission's conclusion in its Statement of Reasons for the DOA Regulations, 2016:

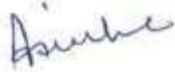
"...since it will be difficult for Distribution Licensees to account the surplus RE in its annual renewable purchase planning to meet their RPO, RE Generators will be allowed to claim REC benefits on this power and Distribution Licensees will not be able to consider this power purchased against their RPO."

14. In view of the foregoing, the Commission does not consider it necessary or appropriate at present to initiate amendment of the DOA Regulations, 2016 to the extent sought by MSEDCL.

The Petition of Maharashtra State Electricity Distribution Co. Ltd. in Case No. 85 of 2017 stands disposed of accordingly.

Sd/-

(Deepak Lad)
Member


(Ashwani Kumar Sinha)
Secretary

Sd/-

(Azeez M. Khan)
Member

