CONSUMER GRIEVANCE REDRESSAL FORUM
M.S.E.D.C.L., PUNE ZONE, PUNE

Case No. 28/2018

Date of Grievance : 17.05.2018
Hearing Date : 27.06.2018
11.07.2018
Date of Order : 31.08.2018

In the matter of complaint for change in category of tariff of the consumer from HT II (Commercial) to HT IX (B) (Public Services – Others) together with refund of excess bill recovery with interest.

M/s. Garrison Engineers ---- Appellant
C/O R R&D, Girinaga Engr. Dighi,
PUNE – 411 025

(Consumer No.170019000551)

VS

The Supdt. Engineer, ---- Respondent
M.S.E.D.C.L.
Rastapeth Urban Circle,
PUNE – 411 011

Present during the hearing:-

A] - On behalf of CGRF, Pune Zone,Pune.

1) Shri. A.P.Bhavathankar, Chairman, CGRF,PZ,Pune
2) Mrs.B.S.Savant, Member Secretary, CGRF, PZ, Pune
3) Mr.Anil Joshi, Member, CGRF, PZ. Pune.

B] - On behalf of Appellant

1) Shri B. Pradeep Kumar, A.E. E/M
2) Shri Kiran Sapkal, J.E., E/M

C] - On behalf of Respondent

1) Shri Sunil Patil, E.E., RPUC
2) Ms. Anju Fuke, Jr. Law Officer,
3) Shri. S.A.Kade, A.A.

1. The present complaint is against the order passed by the IGRC on 16.03.2018 in Case No. 05/2018 against the grievance of the consumer about wrong classification in tariff category of sub-meter from HT – II to HT IX A – i.e. from Commercial to Educational Institute – with effect from August, 2012 to September, 2017 – i.e. the period covered in the grievance filed before the IGRC. The consumer has also prayed before the IGRC for application of proper tariff and refund of resultant excess bill paid by the Appellant to the Utility. The brief background of the present appeal by the consumer is as under –

2. The end use of the supply by the consumer is for education institute of Defense establishment of the Govt. of India. The Military Engineer Services (MES) is a subordinate organization of the Govt. of India, Ministry of Defence and is considered as the deemed licensee as per the third provision of Section 14 of the Electricity Act, 2003. It provides all types of engineering support to the Army, Navy, Air Force, Ordinance Factories, Defence R&D and Defence Hospitals during operational necessities and also during its day-to-day requirements. The consumer states that the MES organization receives electricity supply all over India from the State Electricity supply agencies as HT/LT take over points through single metering arrangements. The electricity supply received by it in bulk is exclusively utilized for defence operations, training, sports recreation, hospitals and for residential accommodation of Defence personnel. Thus, the total consumption of supply by the consumer is partly towards residential purposes and partly towards non-residential purposes. The consumer, therefore, claims that it comes under the category of “HT-IX (A) – Educational Institute” for determination of tariff as against HT- II (Commercial) classified by the Respondent Utility. The consumer further states that the purpose for which the supply is utilized by it has been categorize as “HT IX (Educational Institute)” and accordingly, the Respondent Utility has changed its category from “HT II (Commercial)” to HT IX (A) (Educational Institute)”. However, the consumer states that no action for refund of excess amount recovered from it by the Respondent Utility had been taken by it. Following inaction on the part of the Respondent Utility the Consumer filed its grievance with IGRC on 19.01.2018 and prayed for refund of refund of excess payment made to the Respondent Utility for the period from August, 2012 to December 2017 with aggregate claim for refund to the tune of Rs.2,65,16,290.24 (Rupees two crores sixty five lakhs sixteen thousand

two hundred ninety and paise twenty four only). The IGRC registered the grievance of the consumer with distinctive number as 05/2018 for it. The Consumer claimed before the IGRC that the Respondent Utility had ignored the parameters of purpose for which the supply is required and mentioned in Section 62 (3) of the Electricity Act, 2003 read with Regulation of MERC (Electric Supply Codes – Other Conditions of Supply) Regulations, 2005. For the sake of ready reference, the Consumer has reproduced the same as under-

> "*Classification and reclassification of the consumer into Tariff Categories: The distribution licensee may classify or reclassify a consumer into various commission –approved tariff categories based on the purpose of usage of supply by such consumer. Provided that the Distribution Licensee shall not create any tariff category other than those approved by the Commission while classifying categories."*

3. During its submission before the IGRC, the Respondent Utility claimed that the M/s. Garrison Engineers was being billed under HT-II (Commercial) tariff category with sub-meter. The consumer placed its requisition to the Utility for change of its category to "HT-IX A". Following this the Consumer has followed up the issue for re-categorization / appropriate categorization and refund of resultant excess bill amount paid by it. However, no action had been taken by the Utility on it.

4. In its submission before the IGRC, the Respondent Utility advised that as per application of the consumer, the category of the consumer has been changed suitably from September, 2017 and the process for refund of excess bill payment received from the consumer is in progress.

6. The IGRC had examined submission by both the parties and passed the following order on 16th March, 2018. (The original order passed by the IGRC is in Regional Language – i.e. Marathi) which reads as under -

> "**1.** ***माहिती तंत्रज्ञान विभागात Submeter चे Tariff बदलण्याची Provision झाल्यानंतर सदर ग्राहकाच्या Submeter चा Tariff त्वरित बदलण्यात यावा. तसेच माहिती तंत्रज्ञान विभागात Submeter चा Tariff बदलविण्यासाठी पाठपुरावा करण्यात यावा.***

2. सदर ग्राहकास त्यांच्या 23.08.2016 रोजीच्या विनंती अर्जानुसार व मा. वीज नियामक आयोग यांनी वेळोवेळी मंजूर केलेल्या Tariff नुसार महावितरण कंपनीच्या प्रचलित अटी व शर्तीनुसार Tariff Difference चा Refund देण्यात यावा."

7. The said order passed by the IGRC is placed below in English language for operational convenience –

"1. After the IT Section makes necessary provisions, required changes in Tariff of the consumer in system software be carried out in the sub-meter provided. Further, the Utility should follow up the issue with the IT Section for necessary changes in the tariff in the sub-meter.

2. The consumer is entitled for refund as per its application dt. 23.08.2016 as per tariff orders issued by MERC from time to time as also in tune with the laid down terms and conditions / stipulations by the MSEDCL ".

8. If we analyze the order passed by the IGRC, it is crystal clear that is does not speak of the period for which the refund is admissible, as also the amount of refund admissible, as against the same claimed by the Consumer. .

9. Following the order of the IGRC, the consumer followed up the matter once again with the Utility for refund of excess bill amount paid to it, together with re-categorization of the tariff for the sub-meter, but without any resolution.

10. Aggrieved by the inaction on the part of the Respondent Utility, the consumer filed an Appeal in the prescribed form with the CGRF which was received in the office of the CGRF on 17.05.2018 and was allotted distinctive Case No. 28/2018. Following registration of the grievance of the consumer, the office of the CGRF issued notice to the Respondent Utility, vide its letter No. 132 of 17th May, 2018 on the Respondent Utility calling upon it to file its point-wise say / issue-wise comments on the grievance of the consumer together status reports and documents in support of its defense, on or before 31st May, 2018 with a copy of the same being forwarded to the Complainant. The Respondent Utility, however failed to file its say and/or the interim say within the stipulated time frame pending submission of final say in the matter accordingly, but submitted its say to the office

of the CGRF on 22.06.218 following which the complaint was posted for hearing on 27th June, 2018 to facilitate both the parties to make their submissions in person before the CGRF. The communication from the Utility is, however, silent for the reasons and circumstances for which it could not make submission to the office of the CGRF on or before the stipulated date – i.e. 31.05.2018 and/or its inability to make interim submission pending final submission in the matter.

11. It needs to be noted here that in an application submitted by the Consumer before IGRC, it had claimed for refund of excess payment made to the Utility for the period from August 2012 to August 2017 amounting to Rs.2,65,16,290.24 as per their calculation sheet, without any claim for interest on such excess bill amount paid. However, during its grievance before the office of the CGRF, it was for the first time the Appellant has claimed interest. Further, following passage of time, the Appellant too have revised its claim for refund from Rs.2,65,16,290.24 to Rs.2,83,99,415/- along with refund of excess bill amount paid effective from August, 2012. An opportunity was given to both the parties to make their submission in person before the CGRF.

12. In addition to what the consumer has submitted before the IGRC, as summarized hereinabove in Para No. 2, it has made additional submission before this Forum as under -

a) The purpose for which the supply is utilized has been categorized as HT IX (A) and with effect from August, 2012, MSEDCL has recovered payment from them at the rate applicable to HT-II (Commercial) which is not correct. The Consumer had been following up the issue with the Rasta Peth Office of the Respondent Utility for about 6-8 months for change in the tariff category from HT II (Commercial) to HT IX (A) (Educational Institute) together with refund of excess payment. However, no action had been taken by the concerned authorities of the Utility.

b) After hearing, the IGRC had given decision that the provision for change in tariff of sub-meter is not available in Local IT Section and that these facts need to be informed to Head Office of the Utility at Mumbai for give direction to necessary changes in the category of the sub-meter at corporate level. The Utility too had

advised that as per rules and regulations of the Utility, the tariff difference if any would be refunded, thereafter.

c) However, in its order, IGRC had no where mentioned about the refund period i.e. from which month and year the Utility would refund the excess payment received and also it did not mention about the interest to be paid to the consumer on the excess amount paid to the Utility.

d) Till the date of filing the present complaint before the CGRF, the Utility had not passed on any refund to the consumer.

e) In its grievance before this Forum, the Consumer has, therefore, lodged a claim for refund of Rs.2,83,99.415.24 as per the calculation sheet enclosed to their Schedule A for the period from August, 2012 to April, 2018 as against refund of Rs.2,65,16,290.204 being the excess payment made by it to the Utility for the period from August, 2012 to December, 2017.

f) The consumer, therefore, prayed for directions to the Utility to apply correct tariff to the sub-meter at the earliest and arrange for refund of the excess amount, together with interest, with effect from August, 2012.

13. Subsequent to the order of the IGRC, in its communication to the Consumer, vide its letter No. 6051 dt. 07.07.2018 the Utility has advised the Appellant as under –

> "There is a mixed load of this consumer and the dominating load is residential and there is a sub-meter which records consumption of educational institute. Presently, the sub-meter consumption is billed on commercial tariff. Your application has already been accepted to change the tariff of the sub-meter from 'Commercial' to 'Public Service – HT IX B. But at present there is no provision at local IT Centre to change the tariff as mentioned above. To change the tariff of sub-meter, changes in HT billing software are required and need time for the same." The Utility has already referred the issue to its Head Office vide their letter Nos. 0047, 2259 and 4815 dt. 02.01.2018, 21.02.2018and 30.05.2018 respectively.
>
> - The utility has further suggested the Appellant that the issue can be resolved by making 'Multipartite Arrangement' It means consumer has to apply for new connection for Educational Institute load under multipartite Scheme and present consumer number of the Appellant would be

utilized for residential billing and act as 'Principal' consumer for multiple educational load consumer. Also, Appellant have to pay necessary charges such as processing fees, S.D. etc. In this case tariff of the multipartite Educational Institute can be considered as Public Service.

14. Also in its submission to this Forum vide its letter No. 5629 dt. 21.06.2018, the Utility has submitted as under:

a) M/s. Garrison Engineer - R&D - with consumer No.170019000551 is an HT consumer. The electricity supply is used for R&D purpose with another sub-meter which is used for office work of the consumer. Such use now comes under the category 'Public Service HT-IX (B) since August 2012. It is the admitted fact that the Respondent from time to time assured the Complainant that such changes would be effected at the earliest. The Respondent further admits that the purpose and category is not disputed by them. However, to effect these changes in the System is difficult for them for the present as there is no provision to change tariff category of sub-meter in Information Technology Section. The local Office of the Respondent have no authority to make any such changes in the IT System and have, therefore, escalated the issue to its Apex Authority on 21.11.2017, 02.01.2018, 21.02.2018, 30.05.2018. The Respondents have however, appraised this Forum about the present status on this issue at Corporate office & it is pending as to change in the programme in the software at IT level.

b) The main dispute / issue is regarding change of tariff from HT-II (Commercial) to HT-IX (A) (Educational Institute) effective from August, 2012. The Appellant is having two types of loads – i.e. residential and educational and that the dominating load is residential for which there is a separate sub-meter which records consumption of educational institute. Presently, the sub-meter consumption of educational purpose is billed on commercial tariff and the Appellant is demanding to change the same to educational institute tariff – i.e. H IX B.

c) On this backdrop, the Utility had prayed to the CGRF as under –

(i) The Respondent seeks time to take effect the consumer's tariff category into the system software proposed changes ?

(ii) To remove such difficulty and in view of time it would take, no adverse order to be passed,?

REASONING

15. It needs to be understood that the present consumer of the Respondent Utility - i.e. M/s. Garrison Engineers – is not restricted to Pune Zone, but is the consumer all over the State wherever the Central Govt. has its Defense Establishments and use of supply is also equally for the identical purposes – i.e. R&D, Residential and Office use. Secondly, the issues that have cropped in this case are universally applicable all over the State. Under the given circumstances, the plea of the Respondent Utility to the effect that there is no provision to change the tariff category of sub-meter in Information Technology Section, even after lapse of the period of about five years, can hardly be acceptable. Further in its submission before the IGRC, the Utility submitted that the Tariff category of the consumer had been suitably changed during September, 2017 and the process for refund of past excess payment by the consumer is in progress. The same refund would be effected to the consumer as per the rules prescribed by the Commission and also after decision to that effect by the Competent Authority.

16. It is pertinent to observe that the Utility, in its prayer to the Forum vide its letter No. 5629 dt. 21.06.2018, has maintained silence on the claim of the consumer for payment of interest on the excess amount of bill paid by it to the Utility. However, during the course of personal hearing on 11th July, 2018, the representatives of the Utility strongly object to such a claim for interest before the CGRF first time which was not there in their grievance before the IGRC.or utility officials However, the Respondent Utility did reduce its oral submission before the Forum on 11.07.2018 in writing subsequently.

17. I have perused the documents filed by both the parties in support of their claims together with their submissions before the Forum. I have also perused the findings and order of IGRC on the grievance filed by the consumer with it. After careful perusal of all the relevant papers / documents, following issues have arisen for my consideration –

a) Whether the Appellant is entitled to claim change in category for tariff effective from 1st August, 2012 onwards till April, 2018 alongwith sub-meter ?

b) Whether the Appellant is entitled for refund of excess tariff to the tune of Rs.2,83,99,415/- i.e. for the period from August 2012 to April, 2018 representing excess bill amount paid by it to the Utility from August, 2012 onwards?

c) Whether the consumer is entitled for interest on the excess bill amount paid by it to the Utility for the period from August 2012 to August 2017?

d) What is the order?

REASONING –

(a) & (b) (i) At the outset, it is crystal clear to state that the consumer is entitled to claim change in the category for tariff for the sub-meter effective from 1st August, 2012. The main dispute / issue is regarding change of tariff from HT-II (Commercial) to HT-IX (A) – Educational Institute. Here, it needs to be noted that an another consumer of the Utility – i.e. M/s. Osho International Foundation, Pune, along with M/s. Neo Sanyas Foundation, Pune had filed Writ Petitions bearing Nos. 11764/2012 and 11765/2012 with the prayer that they are educational institution and/or spiritual institutions. Hence, they shall not be treated as "Commercial". Hon'ble High Court clubbed the aforesaid matters and observed that – "The State Commission may classify the Hospitals, Educational Institutions and spiritual organizations which are service oriented and put them in a separate category for the purpose of determination of tariff."

(ii) On 13.03.2013, Hon'ble High Court directed the Commission …."to include spiritual organizations which are service oriented as falling within the definition of the newly created category HT-LX-Public Services. Therefore, the Respondent No. 2 (MSEDCL) shall take necessary steps in the light of the amended definition of the public service. Hon'ble High Court further stated that since the tariff order creates the new category of HT-LX – Public Services with effect from 1st August, 2012, the amendment of the definition shall also be given effect from 01 August, 2012. "

"Once the tariff is amended in compliance with the directions of the Appellate Tribunal for Electricity, thereafter the Respondent No. 2 (MSEDCL) will consider the applicability of the tariff to the case of each of the petitioners herein."

(iii) In tune with directives of the Hon'ble High Court, the MERC passed a Supplementary Order on 22 May 2013 in Case No. 19 of 2012. By this order, MERC created new Tariff category 'HT-IX-Public Services'. However, the said order of the MERC dt. 22.05.2013, which had been effective from August, 16 2012, is silent on refund of tariff difference. In this connection, it is to be noted that no entity is entitled to keep surplus payments received by it from its consumer towards its dues liable to be paid to it. Applying this analogy, the Respondent Utility can hardly deny refund of excess bill amount received by it from the consumer due to delayed re-categorization of the consumer as per fresh Tariff Order issued by the Commission / Apex authority of the Respondent Utility.

(iv) In view of what has been stated against paragraph (iii) hereinabove, it is to be noted that without prejudice to the rights of the consumer, the Respondent Utility is obliged to give refund to the consumer for the wrong categorization for the entire period of such wrong re-classification, as also without limiting the claim for the period preceding to two years from the date of application, merely on the grounds of limitation. This is primarily for the reasons that there is a 'continuous cause of action' as and when the Respondent Utility had been issuing the energy bills to the Appellant under old Tariff category.

(c) (i) The Utility has further submitted during the course of hearing before this Forum that the Appellant had claimed the interest on the above said amount of Rs.2,83,99,415/- for the first time and being the Respondent, they have objection since the Complainant cannot plead for additional prayer before the Appellate Forum which the Complainant has not raised or mentioned or prayed in the original complaint before the lower authority. In support, the Respondent have made reference to two law suits decided by Hon'ble Supreme Court where Hon'ble Supreme Court had clearly barred such pleadings in later stage {(i) – *Bachhaai Nahar Vs. Nilima Mandal &Ors. (2008) SCC 49 and (ii) Nandkishor Lalbhai Mehta Vs. New Era Fabrics Pvt. Ltd. & Ors. (2015) 9 SCC 755. (Copies of both the*

judgment so Hon'ble Supreme Court enclosed as Annexure 'E' and 'F' to the submission made.

(ii) It is, however, to be noted that in its Commercial Circular No. 175 dt. 5th September, 2013 itself under 'Action Plan' the Utility had given directions to the field officers of the Respondent Utility to ensure that wherever the tariff category is redefined or newly created by the Commission, the existing / prospective consumers should be properly categorized by actual field inspection immediately and the data updated immediately in Respondent's IT base. The said Commercial circular issued by the Utility nowhere conditions applicability of the changed tariff subject to suitable application by the consumers to the Respondent Utility and further that the said change in category of tariff would be effective only on such an application having been made by the consumer and approved by the competent authority of the Respondent Utility. It, therefore, follows that the Utility was obliged to comply with the directions of not only its Higher Authorities, but also that of the MERC *mutadis mutandis* for *suo motu* change in the tariff category of all the consumers being served by it, including the one being measured on the sub-meter installed at the site of the Appellant. It is to be also noted further that the Commercial Circular of the Respondent Utility, referred to hereinabove, nowhere subjects the consumers to apply to the Utility for re-categorization of tariff and in the event of consumer's failure to do so and/or delayed application to do so would ultimately lead to restrict its claim for limitation period of two years preceding to its date of application for re-categorization. It was, therefore, mandatory obligation on the part of the Respondent Utility to arrange for *suo motu* re-categorization of the Consumer under the revised category as "*HT-LX – Public* Services" with effect from 1st August, 2012, the amendment of the definition being effective from 01st August, 2012 as per order of Hon'ble High Court dt. 13.03.2013 to the Commission, which has regrettably not been done, thereby leading to continuous cause of action as stated hereinbefore. When examined on this backdrop, the claim for interest of the consumer is well within the limitation period, even under the Limitation Act, as argued by the Respondent Utility. Further, the Respondent Utility has been issuing the energy bills to the consumer without the benefit of re-categorization having been passed on to it for consumption of educational institute reportedly for the IT issues being faced by it. It is worth mentioning here that the order of the MERC for re-categorization of the customers, as stipulated in the supplementary order dated

22.5.2013 in Case No. 19 of 2012 and therefore the Utility happens to be the matter for suitable administrative decision and action plan for implementation of suitable changes in its IT programme to suit the orders of the MERC from time to time. It can, therefore, hardly be an acceptable excuse from the Respondent Utility that they still confront with their IT Section for suitable changes in tune with the orders of the Commission. Secondly, the consumer too had been paying the said demands raised on it, though excessively, over the period for inability on the part of the Respondent Utility to modify its IT programme to meet the obligations arising out of the MERC orders. It, therefore, follows that it's a continuous cause of action in so much as the issue of bills for excessive sums and payment thereof by the Consumer is concerned. The submission of the Respondent Utility that the Consumer had raised the issue for payment of interest for the first time before this Forum and that there was no such mention in its grievance before the IGRC, and therefore, the claim of the consumer for payment of interest effective from 1st August, 2012 stands barred by limitation is without any cogent merits and, therefore, not acceptable. Secondly, it's a settled principle that unless expressly agreed upon by the parties to the transaction, the party receiving any sums in the forms of deposits, advance payments from the other party, the former is obliged to compensate the latter in the form of interest, bonus and/or dividend depending upon the nature of transaction between the two and purpose of such payments / advance payments / deposits etc. It is also to be noted here that in its directions to the Commission on 13.03.2013, Hon'ble High Court had in an unambiguous terms stated that the amendment of the definition shall also be given effect from 1st August, 2012. On this backdrop, it is also imperative to note that the MERC has also stated that the tariff applicable to education institutes, hospitals, dispensaries, primary health care centres etc. has effect from August, 16.2012. This is, notwithstanding the fact that the supplementary order is issued by the Utility on 23.05.2013. The submission of the Respondent Utility before this Forum that suitable changes in their IT programme are yet to be carried out can hardly withstand when the period of more than five years have already elapsed from the supplementary Order of the MERC dated 22.5.2013 in Case No.19 of 2012.

(iii) Notwithstanding what has been stated in the foregoing paragraphs, as also without prejudice to rights of either of the contending parties, the Forum is inclined

to consider the claim of the Appellant for payment of interest for the period of preceding two years since July, 2016, as against since August, 2012 prayed by it in its representation filed with this Forum. However, while deciding the period of two years for payment of interest by the Utility to the Appellant, the issue needs to be considered further for the following circumstances –

a) The Appellants have filed their representation with this Forum on 17.05.2018 against the order of the IGRC and have claimed interest on the entire amount paid in excess by it to the Utility for the period from August, 2012,

b) The issue of excess payment to the Utility has been reported by the Auditors in their report of July, 2016

c) The Appellants have represented to the Utility first time on 23.08.2016

(iv) I am, therefore, inclined to consider the claim of the Appellant for interest for the period of two years preceding July, 2016 – i.e. from July, 2014 at the RBI interest rates prevailing from time to time during the intervening period.

(v) While considering the claim of the Appellant for interest claim for the period of two years, this Forum has perused the facts of the Case No. 29/12 before the MERC between M/s Ankur Seeds Pvt. Ltd. Vs. MSEDCL, decided by the Commission on 2nd February, 2018 dealing with the identical facts and circumstances. The matter is pending before the Full Bench of the Hon'ble High Court of Bombay. The period of interest liability of the Utility has, accordingly been restricted to the period of two years preceding the date of detection of the excess payment by the CAG in July, 2016.

The opportunity was given to both parties i.e. utility and consumer for submission of their relevant documents and if any say is required during the hearing and the hearing was taken twice. Accordingly, the time limit of 60 days prescribed for disposal of the grievance could not be adhered to.

11. In view of the foregoing, I am inclined to pass the following order -

ORDER

a) The Utility is directed to refund the excess recovery of the bill amounting to Rs.2,83,59,415/- for the period from August, 2012 to August 2018 in equal six monthly installments, together with interest since July 2014,

b) The aggregate refundable amount by the Utility – i.e. inclusive of up to date interest should be refunded and adjusted in the monthly bill form next billing cycle following this date of order,

c) To guard against recurrence of the issues identical to those in this case before the Forum, the Appellant may consider the proposal of the Respondent Utility for Multi party Arrangement as proposed by the Respondent Utility to the Appellant vide its communication No. 6051 dt. 07.07.2018, may be acted upon

d) No orders as to cost.

The order is issued under the seal of Consumer Grievance Redressal Forum M.S.E.D.C. Ltd., Pune Urban Zone, Pune on 31st Aug. - 2018.

Note:

1) If Consumer is not satisfied with the decision, he may file representative within 60 days from date of receipt of this order to the Electricity Ombudsman in attached "Form B".

Address of the Ombudsman

The Electricity Ombudsman,
Maharashtra Electricity Regulatory Commission,
606, Keshav Building,
Bandra - Kurla Complex, Bandra (E),
Mumbai - 400 051.

2) If utility is not satisfied with order, it may file representation before the Hon. High Court within 60 days from receipt of the order.

I agree/~~Disagree~~ I agree/~~Disagree~~

Sd/-	Sd/-	Sd/-
ANIL JOSHI	A.P.BHAVTHANKAR	BEENA SAVANT
MEMBER	CHAIRPERSON	MEMBER- SECRETARY
CGRF:PZ:PUNE	CGRF: PZ:PUNE	CGRF:PZ:PUNE