

**BEFORE,
THE JHARKHAND STATE ELECTRICITY REGULATORY COMMISSION
RANCHI.**

SUO MOTO CASE NO 15 OF 2020

In the matter of:

**SUBMISSION IN SUO MOTO CASE NO15
OF 2020**

AND

IN THE MATTER OF

**AJAY BHANDARI,E-71,ASHOK VIHAR,OPP Ashok nagar, P.S.-Argora
RANCHI**

The humble submission on behalf of the Petitioner/Intervenor above named MOST RESPECTFULLY STATE

1. That the instant intervenor petition has been necessitated in Response to the Public notice issued in Newspapers on 29-07-2020 Informing the registration of Suo Moto case no 15 of 2020.
2. That as per directions given by the Govt. of Jharkhand u/s 108 of The Indian Electricity Act 2003, the Hon'able Commission has to Consider
 - 1] Moratorium of 3 months payment of Electricity bills due between 01-04-2020 to 30-06-2020 without levying any DPS for all consumers of the licensees.

- 2] Waiver of Demand /Fixed Charges of Industrial and Commercial Consumers of all Licensees for the period 01-03-2020 to 30-06-2020.
- 3] Considering the impact of moratorium and waiver while Determining the interest on working capital for Licensees In the Tariff.
3. That normally, directions given by the State Governments are Covered u/s 65 of the Indian Electricity Act 2003.
4. That on perusal of the reply of the Licensee JBVNL, the Government of Jharkhand vide letter no 1259 dt.06-07-2020 has turned down its request to provide financial support to the said Licensee meaning thereby that the financial burden of any waiver, remission, moratorium, if any, granted by the Hon'able Commission to any class of consumers, will necessarily be borne by the Licensee.
5. My humble submission to the Hon'able Commission is that, in view of natural justice and also keeping in view the fact that the said Licensee i.e Jharkhand Bijlee Vitran Nigam Ltd [JBVNL] has filed its Tariff petition on the basis of Voltage wise cost of supply, all costs incurred due to any waiver, remission, moratorium pursuant to any order passed by this Hon'able Commission, should necessarily be passed on to that consumer Category, equivalent to the cost incurred by the Licensee

pursuant to such order as mentioned above on that category of consumer.

6. That it will be against natural justice to recover from the smaller consumers, the expenses incurred by the Licensee on bigger consumers, especially so, when the Licensee has proposed to bring down the Tariff of bigger consumers, citing lower cost of supply.
7. That the fact of matter is that cost of supply should not only be calculated on direct cost basis, rather all such hidden costs related to such consumers should also be taken into account while determining their cost of supply.
8. That it is therefor most respectfully prayed that the Hon'able Commission take cognizance of my humble suggestions while Passing any order.
9. That due to the prevalent pandemic it is difficult to file Affidavit and the petitioner most humbly seeks leave for Filing the same.

FOR THIS THE PETITIONER SHALL EVER PRAY.

AJAY BHANDARI,
E-71, ASHOK VIHAR,
OPP. ASHOK NAGAR
ROAD No. 1,
RANCHI- 834002.