

No. 704

UPCL/RM/E-9

Dated: 9-03-2011

BEFORE UTTARAKHAND ELECTRICITY REGULATORY COMMISSION

INDEX

IN THE MATTER OF: Submission of actual data of expenses and revenues for the FY 2009-10 as desired by Hon'ble Uttarakhand Electricity Regulatory Commission in pursuance of Hon'ble Appellate Tribunal's Order dated 31-01-2011 on Appeal No.-41, 42 & 43 of 2010.

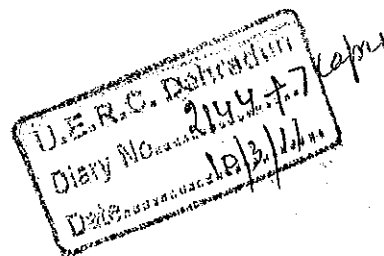
AND

IN THE MATTER OF: Uttarakhand Power Corporation Limited.

(Respondent)

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JML
09/3/11
(Jag Mohan Lal)
Managing Director



BEFORE UTTARAKHAND ELECTRICITY REGULATORY COMMISSION

IN THE MATTER OF: Submission of actual data of expenses and revenues for the FY 2009-10 as desired by Hon'ble Uttarakhand Electricity Regulatory Commission in pursuance of Hon'ble Appellate Tribunal's Order dated 31-01-2011 on Appeal No.-41, 42 & 43 of 2010.

AND

IN THE MATTER OF: Uttarakhand Power Corporation Limited.

(Respondent)

The humble respondent most respectfully Showeth:

1. Hon'ble Uttarakhand Electricity Regulatory Commission (Commission) vide its letter No.-1994/UERC/ATE/2010-11, dated 23-02-2011 quoted the following finding of the Hon'ble Appellate Tribunal for Electricity in its order dated 31-01-2011 issued in appeal no.-41, 42 & 43 of 2010 filed by M/s. Polyplex Corporate Ltd., M/s. Greenply Corporation Ltd. & Kumaon Garhwal Chamber of Commerce and Industry:

"63. In view of our above findings, we deem it fit to set aside the entire tariff order and to remand the matter to the State Commission with a direction to re-determine the tariff on the basis of the existing Regulations and regulatory principles and the judicial pronouncement including those laid down by this Tribunal from time to time, without being influenced by any directions issued by the State Government. The State Commission may also consider the submissions of the Appellants regarding cost of supply, cross subsidy and increase in tariff with respect to the previous year."

In view of the above, Hon'ble Commission directed the respondent to submit its response / written submission in the matter alongwith all the data on actual cost of supply, sales, revenues, cross subsidy from different categories of consumers for the FY 2009-10.

2. In compliance of direction issued by Hon'ble Commission, the information / comments of the respondent company are being submitted hereinbelow:
 - A. **Input energy and billed energy for FY 2009-10:**
 1. The details of input energy & billed energy for FY 2009-10 are as follows:

Input energy at Distribution periphery	-	8,280.09 MU
Billed Energy	-	6,249.21 MU
Re-casted billed energy	-	6,219.83 MU

— / —

2. The consumption of un-metered supply in domestic and private tube-wells categories has been re-casted by applying the load factor of respective metered category as per direction of Hon'ble Commission. The category-wise details of billed energy and re-casted billed energy for FY 2009-10 are as follows:

S No	Category	Billed Energy (MU)	Re-casted Billed Energy (MU)
1	RTS-1: Domestic	1,387.23	1,375.35
2	RTS-2: Non Domestic	735.80	735.80
3	RTS-3: Public Lamps	51.42	51.42
4	RTS-4: Private Tube Wells	181.19	163.69
5	RTS-5: Government Irrigation System	116.96	116.96
6	RTS-6: Public Water Works	247.30	247.30
7	RTS-7: Industry	3,399.16	3,399.16
	<i>LT Industry</i>	201.82	201.82
	<i>HT Industry</i>	3,197.34	3,197.34
8	RTS-8: Mixed Load	122.81	122.81
9	RTS-9: Railway Traction	7.34	7.34
	Total	6,249.21	6,219.83

B. Actual cost of supply for the FY 2009-10:

The head-wise details of cost of supply alongwith justification of the same are enumerated hereinbelow:

1. Power Purchase Expenses for FY 2009-10:

1.1 Power purchase expenses have been computed on the following basis:

- (a) Power purchase expenses are computed as per the actual bills received from the generating companies.
- (b) Energy purchased through U.I. Overdrawl during the year is considered towards State consumption.
- (c) Energy charges for U.I. Underdrawls have been considered in Power purchase expenses and revenue from such U.I. Underdrawl have been shown separately in non-tariff income.
- (d) Cost of free power has been considered at the average power purchase rate in line with the methodology adopted by the Hon'ble Commission in its tariff order dated 23-10-2009.

- (e) Transmission charges payable to Power Grid Corporation of India Limited (PGCIL) and Power Transmission Corporation of Uttarakhand Limited are included in total Power purchase cost for the year and are allocated to the State cost in proportion of State consumption.

1.2 The details of power purchase expenses are as follows:

Details	Units	Cost
	(MU)	(₹ Crore)
NTPC	2,502.13	535.71
NHPC	358.02	138.34
NPCIL	37.43	9.17
SJVNL	10.86	4.04
THDC	62.48	37.51
UI Overdrawal	731.78	321.33
Open Market Purchases	133.35	100.36
UJVNL Main	2,416.39	294.61
UJVNL SHEP	145.04	38.69
UJVNL MB-II	1,187.47	307.76
GoUs Power	632.15	146.67
IPPs & UREDA	151.83	43.45
Total Units Purchased	8,368.93	1,977.64
Transmission and Other Costs	-	175.63
Total Cost of Units Purchased	8,368.93	2,153.27
(+) Excess of Inward Banking	132.10	
(-) U.I. Underdrawl	32.92	8.33
(-) Trading	7.68	2.09
State Consumption	8,460.43	2,142.85
State Consumption including UI Underdrawl	8,493.35	2,151.18

2. Operation and Maintenance (O&M) Expenses for FY 2009-10:

- 2.1 Operation and Maintenance expenses include Repairs and Maintenance, Employee Costs and Administration & General Expenses, which are based on actual expenses as shown in the Annual Accounts for the year.
- 2.2 Operation and Maintenance expenses have been capitalized by the same percentage as was considered by Hon'ble Commission while approving these expenses vide its tariff order dated 23-10-2009.
- 2.3 The details of employee costs are as follows:

Particulars	Cost (₹ Crore)
Employee cost other than arrear of salary (6 th Pay Commission)	156.97
Arrear of salary 6 th Pay Commission	42.47
Gross	199.44
Less: Capitalization	14.80
Net Cost	184.64

2.4 The details of Repair and Maintenance expenses are as follows:

Particulars	Cost (₹ Crore)
Repair and Maintenance expenses	49.20

2.5 The details of Administration and General expenses are as follows:

Particulars	Cost (₹ Crore)
Administration and General expenses	22.35
Less: Capitalization	1.37
Net Cost	20.98

2.6 The details of total O & M expenses are as follows:

Particulars	Actual (₹ Crore)
Operation and Maintenance expense	270.99
Less: Capitalization	16.17
Net Cost	254.82

3. Interest and Finance Charges for FY 2009-10:

- 3.1 No interest has been claimed on GPF Loan, CPSU's dues (as per Ahluwalia Committee Report) CPSU's Liabilities and U.P. Government Loans including liabilities of power purchase due to UPPCL, UPRVNL and UPJVNL, pending finalization of the Transfer Scheme with UPPCL.
- 3.2 Interest on GoU Loans has been claimed on the basis of actual interest accrued (net of capitalization of IDC) during the financial year. In this connection, a certificate of an independent auditor has already been provided to the Hon'ble Commission.
- 3.3 Interest part of the EMI payable during April, 2009 to March, 2010 has been claimed towards interest on REC old loans. This is in line with the terms and conditions of the loan agreement.

- 3.4 Government guarantee fee on loans is claimed on actual during the year.
- 3.5 Other interest and finance charges under this head are claimed on the basis of amount shown in Annual Accounts for the year.
- 3.6 The details of Interest and Finance charges are as follows:

Particulars	Amount (₹ Crore)
APDP	1.87
APDRP	0.88
R-APDRP	1.57
District Plan	3.40
MNP	6.60
PMGY	0.43
PTW	0.26
State Plan	1.05
Total Interest on GoU Loan	16.06
Interest on REC (Old) Loans	31.35
Interest on AREP Loans	2.41
Interest on RGGVY Loans	4.59
Interest on consumers security deposit	12.84
GoU Guarantee Fees	2.60
Other financial & Bank charges	11.01
Gross	80.86
Less: Capitalization	5.40
Net Charges	75.46

4. Depreciation for FY 2009-10:

- 4.1. The value of Gross Fixed Assets (GFA) as on 08-11-2001 has been considered at ₹ 508.00 Crs. as per the value recognized by Hon'ble Commission in Tariff Orders issued from time to time. It is submitted that the value of GFA as on 08-11-2001 has been taken at ₹ 1058.18 Crs. in the provisional Transfer Scheme and therefore the same value is reflected in the Annual Accounts for the financial year 2009-10. Hon'ble Commission is requested to kindly recognize the actual value of GFA as on 08-11-2001 on finalization of Transfer Scheme and allow depreciation accordingly on the value of final GFA.
- 4.2. The details of gross fixed assets for the FY 2009-10 are as follows:

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Head of Account	Amount in ₹ Crore		
	Opening Balance	Net Additions during the year	Closing Balance
Land & Rights	9.90	4.56	14.46
Buildings	55.05	2.50	57.56
Hydraulic Works	0.30	-	0.30
Other Civil works	1.31	-	1.31
Plant & Machinery	252.57	64.47	317.03
Lines & Cable Network	1,240.82	246.70	1,487.52
Vehicles	2.38	0.02	2.40
Furnitures & Fixtures	3.28	1.00	4.29
Office Equipment	10.75	1.63	12.38
Total	1,576.37	320.88	1,897.25

4.3. Depreciation has been calculated for the year as per rates provided in the UERC (Terms and Conditions for Determination of Tariff) Regulations, 2004. Depreciation on the opening value of assets has been provided for the full year and on the assets added during the year for six months. Average rate of depreciation is 3.80%.

4.4. The item-wise details of depreciation are as follows:

Head of Account	Rate	Amount (₹ Crore)
Land & Rights	-	-
Buildings	2.43%	1.37
Hydraulic Works	2.57%	0.01
Other Civil works	1.80%	0.02
Plant & Machinery	3.60%	10.26
Lines & Cable Network	3.91%	53.36
Vehicles	6.00%	0.14
Furnitures & Fixtures	6.00%	0.23
Office Equipment	6.00%	0.69
Total	3.80%	66.08
Less: Depreciation on Grants		35.03
Net Chargeable Depreciation		31.05

5. Provision For Bad & Doubtful Debts for FY 2009-10:

5.1. Annual provisioning towards bad & doubtful debts is an accepted method of accounting and considering the peculiarity of retail supply of electricity business, the same has also been recognized by the State Regulatory Commissions. The amount, if any, written off towards bad debts is only adjusted against the

accumulated provisions in the books, irrespective of the actual amount of bad debts during any particular financial year.

- 5.2. Considering the geographical spread of the large consumer base across the State including a large part of the same prevailing in the difficult terrain and hilly region and the problem of realizing energy dues from retail consumers, the provision of bad & doubtful debts was claimed by the petitioner @ 2.5% on the sales revenue during Truing up exercise on the basis of provisional data for the financial year 2009-10, the Hon'ble Commission approved the same @ 1.5% on sales revenue.
- 5.3. As approved by Hon'ble Commission, bad and doubtful debts have been considered @ 1.5%.
- 5.4. The details of provision for bad and doubtful debts are as follows:

Particulars	Cost (₹ Crore)
Tariff Revenue	1806.23
Provision for bad and doubtful debts @ 1.5%	27.09

6. Interest on Working Capital for FY 2009-10:

In line with the methodology adopted by Hon'ble Commission while approving ARR for financial year 2009-10 vide its order dated 23-10-2009, interest on working capital is being charged as follows:

Particulars	Cost (₹ Crore)
Operation and Maintenance Expenses	21.24
Collection Inefficiency (5%)	90.31
Receivables	376.30
Sub-total	487.84
Less: Adjustment for security	213.98
Credit given by suppliers	179.27
Net working capital	94.60
Interest on working capital @ 12.25%	11.59

7. Return on Equity for FY 2009-10:

- 7.1 Return on equity has been claimed at the same value as allowed by Hon'ble Commission vide its order dated 23-10-2009.
- 7.2 The details of Return on equity are as follows:

Particulars	Cost (₹ Crore)
Return on equity	0.84

8. **Carrying Cost of Deficit:**

8.1. It is submitted before the Hon'ble Commission that there is a carrying cost of deficit, which has been claimed by the petitioner equivalent to the rate of interest on working capital.

8.2. The details of carrying cost are as follows:

Particulars	Cost (₹ Crore)
12.25% of ₹ 68.51 Crore (deficit as on 31-03-2009)	8.39
12.25% of ₹ 844.25/2 Crore (deficit during the year)	51.71
Total carrying cost	60.10

9. **Non-Tariff Revenue for FY 2009-10:**

9.1 The income from non-tariff sources, such as late payment surcharge, interest on deposits and other miscellaneous income are taken as per the figures shown in the annual accounts for the financial year 2009-10.

9.2 Other non-tariff income, i.e. share of trading income and UI revenue are taken as per actual calculations on accrual basis.

9.3 The petitioner received interest on credit sale on account of less drawl from the grid than the schedule. As the Hon'ble Commission never considered collection inefficiency on such sale while allowing interest on working capital, this interest has not been included in non-tariff income. Collection inefficiency on this account has some cost, which was borne by UPCL itself and the Hon'ble Commission did not allow the same cost in Tariff.

9.4 The details of Non-Tariff Revenue for FY 2009-10 are as follows:

Particulars	Amount (₹ Crore)
Interest	5.55
Delayed Payment Surcharge	9.34
Share in trading	0.31
U.I. Revenue	10.24
Miscellaneous charges from consumers	0.27
Miscellaneous Receipts	7.42
Income from Staff Welfare Activities	0.10
Rebate / incentives	18.71
Total	51.94

10. Cost of Supply for FY 2009-10:

Based on above submission, summary of expenses and revenue for the year 2009-10 is as follows:

Particulars	Amount (₹ Crore)
Power purchase	2,151.18
O&M Expenses	254.82
Interest and Finance charges	75.46
Depreciation	31.05
Provision for Bad and Doubtful Debts	27.09
Interest on working capital	11.59
Return on Equity	0.84
Refund of continuous supply surcharge	24.21
Total Expenses	2,576.24
Deficit of Revenue upto 2008-09	68.51
Carrying cost of deficit @ 12.25%	60.10
Aggregate Revenue Requirement	2,704.85
(-) Non-Tariff Revenue	51.94
Cost of Supply	2,652.91

C. Tariff Revenue:

The details of category-wise tariff revenue for FY 2009-10 are as follows:

Category	Re-casted Billed Energy	Tariff Revenue
	MU	₹ Crore
Domestic	1,375.35	261.69
Non-Domestic	735.80	256.72
LT Industry	201.82	66.88
HT Industry	3,197.34	1,060.98
Mixed Load	122.81	34.64
Private Tube-wells	163.69	10.95
Public Lamps	51.42	13.78
Public Water Works	247.30	66.74
Government Irrigation	116.96	30.49
Railway Traction	7.34	3.37
Total	6,219.83	1,806.24

D. Gap between Tariff Revenue and Cost of Supply:

As per details of tariff revenue and cost of supply for FY 2009-10 as mentioned in foregoing paras, the gap between tariff revenue and cost of supply may be shown as follows:

Cost of Supply	-	₹ 2,652.91 Cr
Tariff Revenue	-	₹ 1,806.24 Cr
Gap	-	₹ 846.67 Cr

E. Cross Subsidy:

1. Cross subsidy of various categories can be calculated only in the situation where tariffs are equivalent to cost of supply. Due to a gap of ₹ 846.67 Crore between the cost of supply and tariff revenue for FY 2009-10, cross subsidy for various categories can not be calculated. Therefore, notional addition has been made in tariffs to make it equivalent to cost of supply for the purpose of calculation of cross subsidy. The extent of category-wise cross subsidy for FY 2009-10 computed on average cost of supply as a whole, without considering the affect of policy direction are given in the table below:

Category	Sale	Tariff Revenue	Enhanced Tariff Revenue (with Notional Addition) to make it equivalent to COS	Cost of Supply (COS)	Cross Subsidy
	(MU)	(₹ Cr)	(₹ Cr)	(₹ Cr)	(%)
Domestic	1,375.35	261.69	384.36	586.62	34.48%
Non-Domestic	735.80	256.72	377.06	313.84	-20.14%
LT Industry	201.82	66.88	98.23	86.08	-14.11%
HT Industry	3,197.34	1,060.98	1,558.31	1,363.74	-14.27%
Mixed Load	122.81	34.64	50.88	52.38	2.87%
Private Tube-wells	163.69	10.95	16.08	69.82	76.96%
Public Lamps	51.42	13.78	20.24	21.93	7.72%
Public Water Works	247.30	66.74	98.02	105.48	7.07%
Government Irrigation	116.96	30.49	44.78	49.89	10.23%
Railway Traction	7.34	3.37	4.95	3.13	-58.10%

2. The extent of category-wise cross subsidy is also computed at allocated average cost of supply in accordance with GoU policy directions. The computation details are given herein below:

- 2.1. Summary of source-wise Power Purchase Costs for FY 2009-10 is as follows:

S. No.	Source	Quantum	Total Cost	Avg. Rate
		(MU)	(₹ Crore)	(₹/kWh)
1	UJVNL-Main	2,416.39	294.61	1.22
2	Free Power	632.15	146.67	2.32
3	Maner Bhali II	1,187.47	307.76	2.59

S. No.	Source	Quantum	Total Cost	Avg. Rate
		(MU)	(₹ Crore)	(₹/kWh)
4	SHPs	145.04	38.69	2.67
	Sub total	4,381.05	787.73	1.80
5	Other Sources	4,079.38	1,182.93	2.90
	Total	8,460.43	1,970.66	2.33

2.2 Summary of category-wise requirement of Energy FY 2009-10 is as follows:

S. No.	Category	Total Sales (MU)	Distribution losses	Energy input at distribution periphery (MU)	Energy input at State periphery (MU)
1	PTW	163.69	33.74%	247.06	252.44
2	Domestic	1,375.35	33.74%	2,075.81	2,121.02
3	Government Categories i.e. PWW, GIS, Public Lamps	415.68	33.74%	627.38	641.05
	Sub-total	1,954.72	33.74%	2,950.25	3,014.51
4	LT Industrial and Non Domestic	937.62	33.74%	1,415.15	1,445.97
5	HT Industries and Other HT Categories i.e. Railway Traction & Mixed Load	3,327.49	15.00%	3,914.69	3,999.96
	Sub-total	4,265.11	19.98%	5,329.84	5,445.92
	Total	6,219.83	24.88%	8,280.09	8,460.43

2.3 Summary of category-wise power purchase cost for FY 2009-10 is as follows:

S. No	Category	Power Purchase	Avg. Rate	Total PP Costs
		(MU)	(₹/kwh)	(₹ Crore)
1	PTW	276.62	1.22	33.73
2	Domestic	2,117.83	1.22	258.21
3	Government Categories i.e. PWW, GIS, Public Lamps	634.60	2.28	144.82
	Sub-total	3,029.05	1.44	436.76
4	LT Industrial and Non Domestic	1,431.43	2.82	404.26
5	HT Industries and Other HT Categories i.e. Railway Traction & Mixed Load	3,999.96	2.82	1,129.65
	Sub-total	5,431.38	2.82	1,533.90
	Total	8,460.43	2.33	1,970.66

2.4 Summary of category-wise cost of supply for FY 2009-10 is as follows:

Category	Sales	Total PP Costs	Other Costs	Total Cost	Cost of Supply
	(MU)	(₹Crore)	(₹Crore)	(₹Crore)	(₹/kWh)
PTW	163.69	30.78	17.96	48.73	2.98
Domestic	1,375.35	258.60	150.86	409.46	2.98
Government Categories i.e. PWW, GIS, Public Lamps	415.68	144.01	45.60	189.60	4.56
LT Industrial and Non Domestic	937.62	408.17	102.85	511.02	5.45
HT Industries and Other HT Categories i.e. Railway Traction & Mixed Load	3,327.49	1,129.11	364.99	1,494.10	4.49
Total	6,219.83	1,970.66	682.25	2,652.91	4.27

2.5 The extent of category-wise cross subsidy computed at allocated average cost of supply in accordance with GoU policy directions is given in the table below:

Category	Sale	Tariff Revenue	Enhanced Tariff Revenue (with Notional Addition) to make it equivalent to COS	Cost of Supply (COS)	Cross Subsidy
	(MU)	(₹ Cr)	(₹ Cr)	(₹ Cr)	(%)
Domestic	1,375.35	261.69	384.36	409.46	6.13%
Non-Domestic	735.80	256.72	377.06	401.02	5.98%
LT Industry	201.82	66.88	98.23	109.99	10.70%
HT Industry	3,197.34	1,060.98	1,558.31	1,435.66	-8.54%
Mixed Load	122.81	34.64	50.88	55.14	7.74%
Private Tube-wells	163.69	10.95	16.08	48.73	67.00%
Public Lamps	51.42	13.78	20.24	23.45	13.71%
Public Water Works	247.30	66.74	98.02	112.80	13.10%
Government Irrigation	116.96	30.49	44.78	53.35	16.06%
Railway Traction	7.34	3.37	4.95	3.30	-50.18%

F. Comments of UPCL:

- Actuals of expenses and revenue for the FY 2009-10 should be considered while re-determining the tariffs for FY 2009-10.
- In case tariff of any category(s) is / are reduced due to re-determination of tariff, the tariff of other categories should be enhanced in a manner that the total revenue is equivalent to the total expenses for the FY 2009-10.

- (c) In case tariff is changed from the tariff as determined by Hon'ble Commission vide its order dated 23-10-2009, UPCL will be required to revise the bills of the consumers (14,43,173 consumers) for the period from April, 2009 to March, 2010. There will be great deal of difficulty in revising the bills of all the consumers for the whole year. Besides this, there may be lot of social problems for increasing the bills of the consumers with retrospective effect and there is likely to be discontent in the consumers and may lead to agitations which may create serious administrative problems. Accordingly, it is submitted that the impact of tariff revision may be implemented w.e.f. 01-04-2011.
- (d) The level of cross subsidy may be maintained $\pm 20\%$ as per the provisions of National Tariff Policy.

For and on an behalf of
Uttarakhand Power Corporation Ltd.



(Jag Mohan Lal)
Managing Director

VERIFICATION

I, Jag Mohan Lal, S/o Late Shri Khushi Ram, aged about 62 years, working as Managing Director, Resident of 49/2/2, Teg Bahadur Road, Dehradun do hereby verify that the contents of paras 1 & 2 (A to F) are derived from official records, which are true to my personal knowledge and that I have not suppressed any material fact.

Deponent



(Jag Mohan Lal)
Managing Director

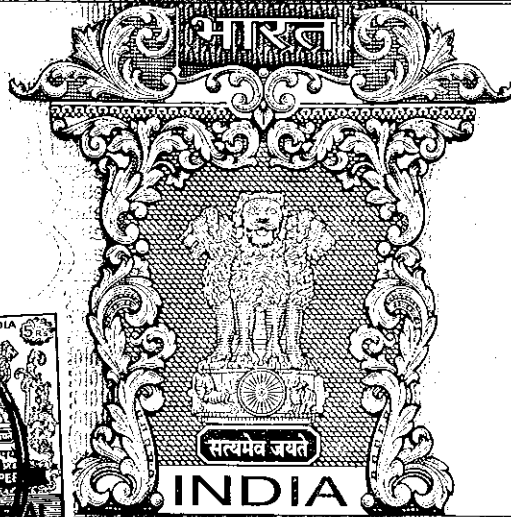
Uttarakhand Power Corporation Limited

भारतीय गैर न्यायिक

दस
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TEN
RUPEES

Rs.10



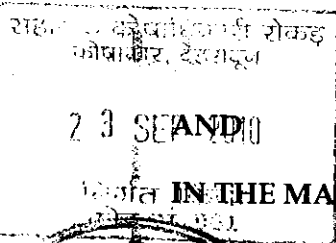
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Case No.

NON JUDICIAL
BEFORE THE UTTARAKHAND ELECTRICITY REGULATORY COMMISSION

उत्तराखण्ड IN THE MATTER OF: UTTARAKHAND

Submission of actual data of expenses and revenues for the FY 2009-10 as desired by Hon'ble Uttarakhand Electricity Regulatory Commission in pursuance of Hon'ble Appellate Tribunal's Order dated 31-01-2011 on Appeal No.-41, 42 & 43 of 2010.



IN THE MATTER OF:

Uttarakhand Power Corporation Limited.

(Respondent)

AFFIDAVIT VERIFYING THE PETITION

I, Jag Mohan Lal, S/o Late Shri Khushi Ram, aged about 62 years, working as Managing Director, Resident of 49/2/2, Teg Bahadur Road, Dehradun, the deponent named above do hereby solemnly affirm and state on oath as under:

That the deponent is the Managing Director of Uttarakhand Power Corporation Limited and is acquainted with the facts deposed to below.

- 1, the deponent named above do hereby verify that the contents of the paragraph No.-1 of the affidavit and those of the paragraph No.- 1 & 2 (A to F) of the accompanying petition are based on the perusal of records which I believe to be true and verify that no part of this affidavit is false and nothing material has been concealed.

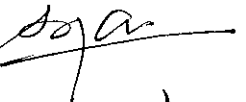
Deponent

Jag Mohan Lal
9.3.11

(Jag Mohan Lal)
Managing Director

Uttarakhand Power Corporation Limited

I, S. M. Jain, Advocate, do hereby declare that the person making this affidavit is known to me through the perusal of records and I am satisfied that he is the same person alleging to be deponent himself.

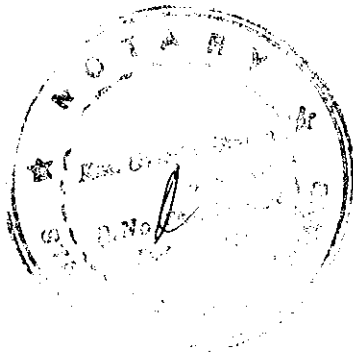

(.....)
Advocate

Solemnly affirmed before me on this ..02... day of03... by the deponent who has been identified by the aforesaid advocate.

I have satisfied myself by examining the deponent that he understood the contents of the affidavit which has been read over and explained to him. He has also been explained about section 193 of Indian Penal Code that whoever intentionally gives false evidence in any of the proceedings of the Commission or fabricates evidence for purpose of being used in any of the proceedings shall be liable for punishment as per law.



(Notary Public)



This Affidavit is Sworn before me
Shri Jag Mohan Lal
who is identified by shri S. M. Jain
at Dehradun on 02/03/11 Adv.
K. S. BHATIA
Advocate & NOTARY, Dehra Dun