



## Chhattisgarh State Electricity Regulatory Commission

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### In the matter of use by sponge iron plants of electricity generated in situ from the waste heat of the plants– action under Section 142 of the Electricity Act.

#### Suo motu petition No. 15 of 2008(M)

M/s Salasar Steel and Power Ltd ..... Respondent No.1  
Chhattisgarh State Electricity Board ..... Respondent No.2

#### Suo motu petition No. 14 of 2008(M)

M/s Abhijeet Infrastructure Ltd ..... Respondent No.1  
Chhattisgarh State Electricity Board ..... Respondent No.2

Present: S.K.Misra, Chairman  
B.K.Sharma, Member

### **ORDER** **(Passed on 27.11.2008)**

#### Suo motu petition No. 15 of 2008(M)

The facts of this case are that M/s Salasar Steel & Power Ltd (formerly Salasar Sponge & Power Ltd.) has a 200 TPD sponge iron and 15 MW power plant at Raigarh. Having received information from the Chief Electrical Inspector of the State, which is the authority directed by the Commission to monitor the consumption pattern of the electricity generated by captive generating plants, that the captive consumption of the industries of M/s Salasar Steel & Power Ltd., was much below 51% for the year 2006-07, a notice was issued to the company on 16.04.2008 to furnish information regarding the capacity of the plant, the net generation and captive consumption, during the year. As no information was received in time, a reminder was issued on 05.06.2008. The company furnished its reply on 28.06.2008 according to which the details of the capacity and consumption of electricity generated by the power plant for the year 2006-07 were as under:

(i) Capacity of the plant	: 15 MW
(ii) Total Generation	: 68.39 MU
(iii) Captive consumption	
Sponge iron division	: 2.46 MU
Coal washery	: 0.28 MU
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Total	: 2.74 MU
Power plant auxiliary consumption	: 6.68 MU

Thus as per the information submitted by the company, the total captive consumption was only 2.74 MU against a total generation net of auxiliary consumption of 61.71 MU (68.39 – 6.68 MU). A notice was issued to the company on 31.7.2008 under section 142 of the Electricity Act, 2003 (the Act hereinafter) for violation of provisions of section 12, in that electricity can not be supplied to an industry by a generating plant, which did not qualify to be a captive power plant in terms of the definition of the 'captive generating plant' as given in clause 8 of section 2 of the Act read with Rule 3 of the Electricity Rules, 2005 (hereinafter the Rules), except through a distribution licence, or by availing open access under Sec. 42(2) of the Act. The company was asked to show cause why punitive action should not be taken against it for contravention of the provisions of the Act and the Rules. The company, in its reply of 18.08.2008, has pleaded that self-consumption by the sponge iron plant, which is the source of heat for the power plant, should not be treated as sale, and hence the company does not require any licence for supply of power to its own industry. In the further submission made on 23.10.2008, it has been contended that the generation plant is in fact a co-generation plant and it is enjoined upon the Commission under section 86 (1)(e) of the Act to promote such co-generation. Self-use of electricity from a cogeneration plant should be permitted without any hindrance.

2. From the reply of the company (respondent No.1) it appears that the power plant was intended to be set up as a captive one, but due to certain constraints it became an IPP. The company has entered into a PPA with the Chhattisgarh State Electricity Board (CSEB or the Board, for short), for sale of power, in the short term and during the period in question, it has supplied 58.59 MU. The 15 MW power plant is designed to harness the waste heat released by the sponge iron plant, to produce electricity, through a waste heat recovery (WHR) boiler, to the tune of 5 MW. The company has separately installed a Fluidised Bed Combustion (FBC) boiler in which a fuel mixture of dolachar, coal washery rejects and F-grade coal is used. The company has used a very small portion of the power in its sponge iron plant and its coal washery. Admittedly the generating plant of respondent No.1 is not a captive one. Sec. 10 of the Act lays down the duties of the generating company. As per the provision of sub-section (2) of this section, a generating company may supply electricity to any consumer subject to the regulations made under sub-section (2) of section 42. Sub-section (2) of Section 42 deals with open access. Since the power plant is co-located with the sponge iron plant, to which power has been supplied, open access to CSEB grid is not involved, as not required, in this case. There is no other provision for supply of power to a consumer by a generating company in the Act. Electricity can be supplied to the consumer by a person who has obtained a license under Sec. 12 of the Act to distribute electricity. The respondent company does not hold a distribution licence.

3. As against this position, the respondent company has pleaded as under:

(i) The definition of 'consumer', 'supply' and 'distribution' in the Act clearly proves that consumption within the same premises of a common entity is not 'distribution', since no sale of electricity and no third party sale is involved. A "**consumer**" has been defined in Sec. 2(15) of the Act and means 'any person who is supplied with electricity for his own use by a licensee or the Government or by any other person engaged in the business of supplying electricity to the public under this Act or any

other law for the time being in force xxxxx". **"Distribution licensee"** has been defined in Sec. 2(17) and it means 'a licensee authorized to operate and maintain a distribution system for supplying electricity to the consumers in his area of supply'. **"Supply"** as per definition given in Sec. 2(70) means 'the sale of electricity to a licensee or consumer'. On the basis of the above position in law, it has been pleaded since that both the sponge iron kiln and the power plant are part of the same legal entity and share the same premises, the transfer of electricity within the same legal entity cannot be treated as sale of electricity to a third party and hence it does not fall within the scope of 'supply' and it cannot be treated as 'distribution'. No licence under the Act is required for self-use within the legal entity.

(ii) The power being generated through WHR boiler necessarily requires the sponge iron kilns to be operational, so that waste heat is generated for use in the boiler. The sponge iron kilns should be treated as auxiliary equipment i.e. equipment without which the power plant will not be in a position to generate power. The power consumption by the sponge iron kilns should, therefore, be treated as auxiliary consumption.

(iii) The Chhattisgarh State Electricity Supply Code (Supply Code, for short) prohibits provision of two connections to the same premises. The company's application for a separate power connection was declined by the CSEB on this ground. At the time of commissioning of the plant's 132 KV connectivity, the company was asked to surrender the existing connectivity to the sponge iron plant. The respondents thus have no other go but to use the power of generating plant in the sponge iron plant.

(iv) An additional submission has been made that the power plant based on waste heat generated by the sponge iron kilns is 'cogeneration' as per the Ministry of Power resolution No. A-40/95/IPC-I dated 6<sup>th</sup> November, 1996 on the subject 'Promotion of co-generation power plant'. Sec. 86(1)(e) enjoins upon the Commission to promote cogeneration and generation of electricity from renewable sources of energy. Any restriction by way of cross-subsidy surcharge or otherwise, for use of power from such plants, would be a disincentive to co-generation and hence contrary to the provisions of law. Therefore, it has been strongly pleaded that co-generation based plants should be exempted from any penalty or cross-subsidy surcharge for use of such power for running of a process which is a part of the cogeneration process itself.

4. The CSEB was impleaded as a party in this case as the industries to which electricity is being supplied by the respondent are located in the Board's area of distribution. The Board was asked to submit comments, if any, on the reply submitted by the respondent to the Commission's show cause notice. In their brief reply of 10.9.2008, CSEB sought clarification from the Commission as to whether the impleadment was desired on the issue of illegality of the activity being undertaken by the generators by supplying the own industrial load or on the possibilities of bringing this activity into the ambit of legal framework. It was explained to the Board that action under Sec. 142 and bringing any action, prima facie illegal, under the ambit of law were not contradictory and that both could be considered simultaneously. The Board has, however, only pleaded during argument that the generator, not being a captive power plant, cannot supply power to its industries for self-consumption. On

the issue of technical difficulty of a separate connection for supply of electricity by the Board to the industry, the Board pleaded that there was no such technical difficulty and a way could be found. The Board has submitted the method by which the technical difficulty can be got over.

5. The following issues arise for consideration:

(i) Does supply of power to the industries of the company from its generating plant, without a licence under Section 12, or without availing open access under section 42(2) of the Act, constitute a violation of the provisions of Act?

(ii) Should the use of electricity generated from the waste heat of sponge iron kilns, and used by such kilns, be treated as auxiliary consumption?

(iii) Is the generation of electricity by a power plant based on waste heat recovery from sponge iron kilns co-generation? If yes, should self-consumption in the kiln itself be permitted as supply to an industry and if yes, on what terms?

6. Before we discuss the issues involved, certain facts peculiar to the two cases being considered in this order need to be underlined in the interest of justice. It is admitted that a sponge iron plant burns coal in kilns and the process generates heat at very high temperature. Release of these gases into the atmosphere is a pollution hazard and hence these gasses are required to be cooled down to a particular level before being released. However, the same heat can be recovered through a waste heat recovery (WHR) boiler and the steam generated by such a boiler can be used to drive a turbine to generate electricity. The use of waste heat of sponge iron plants, for generation of electricity should therefore be welcome. Such use, as already mentioned, also prevents environmental pollution. Secondly, of necessity the power plant has to be located in the close proximity of the sponge iron kilns, and the whole process is generally so integrated that certain utilities may be common to both the sponge iron plant and the power plant. Hence the use of the power generated is in situ. However, the waste heat is used only in the WHR boiler and not to the FBC boiler, which uses coal and dolachar from sponge iron plant, as fuel for generation of power. The second boiler is installed only for optimization of capacity and has no direct relevance to the sponge iron plant. In fact, it can be operated independent of the sponge iron industry. This position has been confirmed by the respondent in case No. 14 of 2008(M). However, the argument that the whole process of generation of waste heat in sponge iron kilns should be treated as an auxiliary process to power generation and the power consumption for the same should be considered as auxiliary consumption, is tautological and illogical. The sponge iron plant is not set up to produce power but to produce sponge iron. Power is a by-product obtained by utilization of the waste heat generated in the process of manufacture of sponge iron. Even if the process of this power generation is accepted as co-generation, the sponge iron kilns are not auxiliary of the power plants. Therefore, this argument is not tenable. The generating unit has to be considered as an independent power-producing unit.

7. There is no provision in the Act for a generating plant being set up by a company for its own use, except in the category of a captive generating plant. Rule 3 of Rules lays down the requirement of a captive generating plant and as per this rule

at least 51% of the electricity generated should be consumed for the captive use. Admittedly the sponge iron plant of the company requires not more than 50% of the power generated by the associated power plant, and is not a captive generating plant. The power plant is an IPP. There is no provision in the Act for a generating company to supply electricity to a consumer, as mentioned in para 1 above, except subject to regulations made under sub-section (2) of Section 42 i.e. through the open access notified by the Commission. There was no need in this case for access to the wires of the Board since, as already mentioned, the sponge iron manufacturing unit and the power plant are co-located to an extent of being almost an integrated entity, and of necessity. Therefore, under no provision of the Act could the electricity from the power plant have been utilized in the sponge iron plant. In view of this position one way out can be the sale of electricity generated by the power plant to the Board or any other consumer, while the industry avails supply from the Board. There is a technical difficulty in pursuing this course: the Supply Code prohibits provision of two connections with the grid to the same premises as it is liable to misuse because of tariff differential. This, in fact, has been raised as one of the issues and a ground for self-use of power. The Board has contested this position, and on our direction, has suggested the manner in which this technical difficulty can be got over. The Board's suggestion which has been submitted in petition No.10/2008 on 10.11.2008 and which is sought to be applied to these two cases also, is as follows: Since import and export of power cannot take place simultaneously through a single connectivity, evacuation of power to the grid from a generating plant and supply of power to industrial load associated with the same power plant, is not possible. This problem can be met by installing a separate consumer meter by CSEB at the point of supply of electricity from the generating plant to the industry so as to maintain proper accounting of electricity supplied to the industry. *This supply should be treated as supply by the power plant to CSEB on terms and conditions of power purchase. The CSEB shall separately issue a bill to the industry as if it is CSEB's consumer, as per the tariff applicable to the consumer category (Emphasis added).* The Board has also proposed that for the distant located industrial load being supplied through the dedicated transmission line by the CPP, the same supply system can be continued by taking over the supply line by CSEB and installing consumer meter at point of supply to record the power supplied. The Board feels that with such a commercial and technical arrangement, the problem of unauthorized supply of electricity by a generating plant to an industry can be overcome. We find it difficult to agree to the suggestion of CSEB, which involves more or less forcing a generating plant to sell its power only to CSEB. Such an arrangement will be against the spirit of the provisions of the Act. There will also be commercial issues like tariff at which electricity is to be procured by the CSEB and at which it is supplied to the industry. The supply tariff is likely to be always more than the tariff fixed for purchase of power. Besides, this proposal will require change in the terms and conditions of the agreement between such consumers and the Board. In case of a CPP, since the status of CPP may change to IPP on account of not consuming 51% energy generated by the plant by way of captive load, the agreement may not remain in force in continuation and may change every year. The CPPs/generators/their industries which are not availing power from the Board will also be required to execute agreement with the Board for supply since in case of losing the status of CPP, they will be required to be billed as per Board's tariff. In case the dedicated transmission lines is to be taken over by the Board, maintenance of the lines will be required to be done by the Board. Since, the dedicated line will not be connected with the Board's grid, first hand status of

trippings/interruptions on dedicated transmission line will not come to the knowledge of the Board. Further, difficulties will be experienced in obtaining shutdown and permits etc., for carrying out maintenance. Moreover, the practical difficulty of ascertaining relative consumption of the power plant and the industry in certain facilities, which are common to both, will remain.

8. In view of the nature of this case as described above in para 6, we feel that it would be appropriate in the interest of promotion of decentralized generation and decentralized consumption of power, to allow the company to use the electricity generated in situ, although, as we have already noted, there is no clear provision in the Act for such self-use. But there is a clear provision in the Act for open access which is, in fact, a significant provision. Such a provision did not exist in the earlier statutes governing the electricity sector. It has been introduced in the present statute primarily to allow the consumers access to electricity from the source they like, such sourcing being technically feasible. We feel that if under the scheme of the Act a consumer is permitted to source his power from any generator, it would not be logical to deny him the use of the power generated in his own power plant, which, moreover, as in this case, has been set up based on the waste by-product of the own industry. Denying a consumer the use of power generated by him would, in a sense, be a negation of the provision of the open access in the Act. Such decentralized generation and distribution saves on losses. However, the question which can be validly raised is the terms on which such self-use may be permitted. Open access is permitted to a consumer under the following provisions of the Act.

**“Section 42: Duties of Distribution licensees and Open Access:**

(i) xxx xxx xxx

(ii) The State Commission shall introduce open access in such phases and subject to such conditions (including the cross-subsidy and the operational constraints as may be specified within the one year from the appointed date and in specifying the extent of open access in successive phases and in determining the charges of wheeling, it shall have due regard to all relevant facts including such cross-subsidies, and other operational constrains:

Provided that such open access shall be allowed on payment of surcharge, in addition to the charges for wheeling as may be determined by the State Commission:

Provided further that such surcharge shall be utilized to meet the requirements of the current level of cross-subsidy within the area of supply of distribution licensee xxx xxx xxx”.

Cross-subsidy surcharge, as above, is not leviable on a captive consumer availing power from his captive power plant. The situation in the present case is similar except that on the ground of quantum of consumption, the consumer cannot be classified as a ‘captive consumer’ and the generator does not meet the criteria of a ‘captive generating plant’ (However, there is no scope for operational constraints like availability of transmission /distribution network in this case because the power is consumed in the same location). No transmission or wheeling charge is payable to the licensee as the latter’s wires are not being used. The only other condition is the

payment of cross subsidy surcharge. A provision for surcharge to meet the current requirement of cross subsidy has been prescribed in the Act because of the prevailing pattern of electricity tariff all over the country. There are certain category of consumers such as, agricultural and small domestic consumers, who have been traditionally provided electricity at a subsidized rate, below the cost of supply, and the industrial and commercial consumers have generally been cross-subsidizing such consumption. The Act recognizes the existence of cross subsidy which is a historical fact. In fact, while earlier there was a provision in the Act (Section 42) for progressively reducing and 'eliminating' the cross subsidy, the Act was amended in 2007 to provide for only 'progressive reduction' and not elimination of cross-subsidy. There is a provision for payment of cross-subsidy surcharge for open access customers because the licensee has to be compensated for the loss of a consumer who has been subsidizing other consumers. The licensee is entitled to a cross-subsidy surcharge when a subsidizing consumer migrates outside his fold and avails supply from a different source, through open access. The same logic can be applied to this case and the industrial consumer, who has been earlier availing supply from the Board and has now switched over to sourcing his own generating plant, asked to pay cross-subsidy surcharge to the licensee. It has been argued by the respondent No.2 that cross-subsidy surcharge is applicable only in case of open access and since open access is not involved in this case, the industry is not liable to pay cross-subsidy surcharge. We are unable to agree with this argument. As already mentioned, cross-subsidy relates to prevailing electricity tariff and not to open access as such and it is recovered to compensate the loss of a subsidizing consumer to the licensee. We, therefore, hold that cross-subsidy, as determined by this Commission in the relevant year's tariff order, should be paid by the company for use of electricity generated by its power plant in all such cases. As denial of use of electricity generated to the industry would not be appropriate this would appear to be the only logical solution to us.

9. It has been pleaded by respondent No.1 that the power plant being a cogeneration plant, it should be promoted by the Commission in terms of the provision of Section 86(1)(e) of the Act. This provision reads as under:

**“86. Functions of the State Commission:** (i) The State Commission shall discharge the following functions, namely:

- (a) xx xx xx
- (b) xx xx xx
- (c) xx xx xx
- (d) xx xx xx
- (e) Promote cogeneration and generation of electricity from renewable sources of energy by providing suitable measures for connectivity with the grid and sale of electricity to any person, and also specify, for purchase of electricity from such sources, a percentage of the total consumption of electricity in the area of a distribution licensee”.

Cogeneration has been defined in the Act under Sec. 2(12) as “a process which simultaneously produces two or more forms of useful energy (including electricity)”. Ministry of Power passed a resolution (No.A-40/95-IPC-I) on 6<sup>th</sup> November 1996 on

promotion of co-generation power plants. This resolution contains a more elaborate definition of cogeneration as under:

**“2. Definition of co-generation:**

2.1 A cogeneration facility is defined as one, which simultaneously produces two or more forms of useful energy such as electric power and steam, electric power and shaft (mechanical) power etc. Cogeneration facilities, due to their ability to utilize the available energy in more than one form, use significantly less fuel input to produce electricity, steam, shaft power or other forms of energy than would be needed to produce them separately. Thus by achieving higher efficiency, cogeneration facilities can make a significant contribution to energy conservation”.

Para 5 of the resolution talks of two basic co-generation cycles, viz. topping cycle and bottoming cycle. Under bottoming cycle, co-generation is ‘any facility that uses waste industrial heat for power generation by supplementing heat for any fossil fuel’. The qualifying requirement for bottoming cycle is provided in para 6, as under:

**“(ii) Qualifying Requirements for Bottoming cycle:**

In case of bottoming cycle, the total useful power output in any current year must not be less than 50% of the total heat input through supplementary firing”.

It has been pointed out by the respondent that the specific coal consumption of the sponge iron plant which has WHR boiler power plant is the same as that of stand alone sponge iron power plant. No additional/supplementary fossil fuel is burnt to produce power. Thus clearly the useful power output in the year is greater than 50% of the quantity of fuel fired for generation of power. Thus the power plant based on the waste heat of a sponge iron plant, which generates electricity using the steam produced by the waste heat recovery boiler, falls in the category of co-generation of the ‘bottoming cycle’. It has been provided under Section 86(1)(e) of the Act as one of the functions of the Commission to promote co-generation. Even otherwise, generation of power by utilizing a highly polluting waste gas, coming from sponge iron kiln, should be promoted in the overall interest of decentralized generation, useful utilization of waste material which is a pollutant and in the interest of the environment. A cross-subsidy surcharge on use of electricity generated by co-generation facility and of the nature described above, may be a disincentive for such plants. In the case of biomass based plants and small hydel plants, this Commission, with a view to encourage such generation, has ordered that in case a consumer who sources his power from such plants, the cross-subsidy surcharge payable shall be half the normal cross-subsidy. In case of the co-generation plants also we order that the cross-subsidy surcharge payable by a consumer availing its power shall be 50% of the normal cross-subsidy.

10. In the light of the above discussion our finding on the issues raised in this case are as follows:

(i) Does supply of power to the industry of the company from its generating plant in this case constitutes a violation of provision of the Act – Yes, it does.

However, although the respondent has supplied power to its own industry without a distribution licence and without availing open access in violation of the provisions of

the Act, we would like to take a lenient view in the case because of its peculiar nature. The respondent did not require open access because the industry is co-located with its generating plant. It is also to be noted that the respondent would not have been granted a distribution licence U/S 12 of the Act even if he applied for one, as he does not satisfy the minimum area requirement prescribed under the Distribution of Electricity Licence (Additional Requirements of Capital Adequacy etc.) Rules, 2005, which is a district or municipal town, for grant of such licence. We therefore do not impose any penalty U/S 142 against the respondent. The consumption of electricity by the industry generated by its power plant shall, however, attract cross-subsidy to be paid to the licensee in whose area the industry is located, in this case the CSEB. The Commission considers this is the only logical way to regularize such consumption.

(ii) Should the use of electricity generated from the waste heat of sponge iron kilns be treated as auxiliary consumption? The answer is clearly no.

(iii) Generation of electricity by a power plant based on waste heat recovery of sponge iron kilns cogeneration? The answer is yes. Since one of the responsibilities assigned to the Commission is cogeneration and we feel that cogeneration plants based on waste heat of sponge iron merit such promotion the cross-subsidy payable shall be reduced to half the normal rate. The company shall pay cross-subsidy surcharge to the licensee at half the normal rate for the energy consumed in its sponge iron industry during the year 2006-07. For the future the Board shall ensure installation of suitable meter to ascertain the power consumption by the industry at the consuming end. On the basis of such consumption cross-subsidy surcharge shall be payable to the Board, every month, final adjustment being made at the end of the financial year. Such cross-subsidy shall be as specified by the Commission for the voltage level, at which the industry has connectivity with the grid. While working out consumption, the power consumed by way of auxiliary consumption and auxiliary facilities such as, ESP etc., which is common to both the generator and the industry, shall be excluded. This facility provided to a co-generation plant will, however, not be available in case of the power generated using the other boilers which have been installed primarily for optimization of capacity and as these boilers have no direct relationship with the operation of the sponge iron plant. Therefore if the consumption of the industry exceeds the generation of the cogeneration plant calculated on an annual basis, in proportion to the capacity of the boiler, cross-subsidy shall be payable at full rate on the amount of electricity consumed in excess of generation from WHR boilers. The company should declare the potential of power generation from the steam generated by waste heat recovery boiler and other boilers to the Board, since both the boilers support the same turbine for generation of electricity.

**Suo Motu petition No.14 of 2008(M):**

11. The facts of this case are similar to those of case No.15 of 2008 (M) discussed above. M/s Abhijit Infrastructure Pvt. Ltd., has a 350 TPD sponge iron plant at Siltara, Raipur, to harness power from the waste heat generated by its sponge iron plant. The company has set up a waste heat recovery boiler of 39.2 ton capacity which is used for generation of electricity. The company has installed a separate 33 ton FBC boiler, and with the help of these two boilers runs a 15 MW

generator. The company has clarified, on a query by the Commission, that the generation potential of the WHR boiler is about 8 MW and FBC boiler is about 7 MW. The power plant was set up in March 2007. During the year 2006-07 the net generation of electricity was 4.35 MU while the captive consumption was only 0.03 MU and the company supplied electricity to its industry without obtaining a distribution licence under Section 12 of the Act nor availing open access under Section 42(2) of the Act, a show cause notice was issued to the company on 31.7.2008, under Section 142 of the Act, calling upon it to show cause why penal action should not be taken against it for violation of the provisions of the Act. In its reply dated 18.8.2008 the company had pleaded on the same lines as has been pleaded by the respondent in the case above that (i) it is not a generating company and that the plant has been installed for self use though it cannot use more than 3 MW for sponge iron plant and auxiliary consumption of the plant. (ii) It has been pleaded that the company is not engaged in distribution of power but only in self-use. As in the other case, it has also been claimed that the generation of power from the waste heat of the sponge iron plant is co-generation and that in terms of the provisions of the Act 86(1)(e) co-generation should be encouraged and not discouraged by the Commission. The respondent has pleaded for exemption from all restrictions on self-use by a sponge iron plant in view of the special circumstance of generation of power based on the waste heat of its sponge iron plant.

12. The facts and circumstances of the case being similar to those of case No.15 of 2008(M), as discussed above, our findings as given in para 10 in the other case shall be fully applicable to this case also. We order accordingly in this case.

**Sd/-  
Member**

**Sd/-  
Chairman**

**True Copy**

**(N.K. Rupwani)  
Secretary**