



National Electric Power Regulatory Authority

Islamic Republic of Pakistan

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Registrar

No.NEPRA/R/TRF-100/3685-3687
November 4, 2010

Subject: **Determination of the Authority regarding Security Deposit Rates applicable to all DISCOs - Intimation of Determination of Tariff pursuant to Section 31(4) of the Regulation of Generation, Transmission and Distribution of Electric Power Act (XL of 1997)**

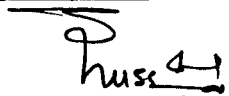
Dear Sir,

Please find enclosed herewith the subject Determination of the Authority along with Annexure-I (10 pages) regarding Security Deposit Rates applicable to XWDISCOs.

2. The Determination is being intimated to the Federal Government for the purpose of notification of the approved rates in the official gazette pursuant to Section 31(4) of the Regulation of Generation, Transmission and Distribution of Electric Power Act (XL of 1997) and Rule 16(11) of the National Electric Power Regulatory Authority Tariff (Standards and Procedure) Rules, 1998.
3. Please note that only 1st and last columns of Annex-I of the Determination need to be notified in the official gazette. The 1st and last columns of Annex-I are reproduced hereunder for the purpose of clarity:

Description	Average Security Deposit Rates determined for all DISCOs
Residential	
Urban	Rs. 1,220 / kW
Rural	Rs. 610 / kW
Commercial A-2	
Urban per Kw	Rs. 1,810 / kW
Rural per Kw	Rs. 920 / kW
Industrial	
B1	Rs. 1,580 / kW
B2	Rs. 2,010 / kW
B3 -	Rs. 2,890 / kW
B4	Rs. 3,560 / kW
Single Point Supply for further distribution	
C1 Supply at 400	Rs. 1,670 / kW
C2 Supply at 11 kV	Rs. 2,080 / kW
C3 Supply above 11 kV	Rs. 2,740 / kW
Agricultural Tube-wells - Tariff D	
Agricultural Tube-wells (including scrap)	Rs. 15000 lump sum
Public Lighting - Tariff G	Rs. 3,240 / kW
Tariff H - Residential Colonies attached to industries	Rs. 1,560 / kW
Special Contracts - Tariff K (AJK)	Rs. 2,570 / kW
Traction - 1	Rs. 610 / kW
Special Contracts - Tariff K (Rawat)	Rs. 2,900 / kW
Tariff - F (Seasonal)	

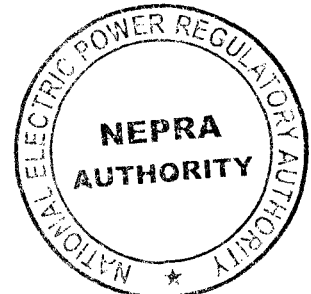
Enclosure: As above


(Syed Safer Hussain)

Secretary,
Ministry of Water & Power,
'A' Block, Pak Secretariat, Islamabad

CC:

1. Secretary, Cabinet Division, Cabinet Secretariat, Islamabad.
2. Secretary, Ministry of Finance, Islamabad.





Background

- 1.1 In the year 2007, the Authority in exercise of its suo-moto powers had initiated the proceedings to re-determine the security deposit rates for the Ex-WAPDA Distribution Companies. Accordingly the DISCOs were served notices to file petitions for the determination of their security deposit rates.
- 1.2 In compliance of the above mentioned directions, Faisalabad Electric Supply Company (FESCO) and Lahore Electric Supply Company (LESCO) filed petitions in July 2007 for the determination of security deposit rates for each category of their consumers. Multan Electric Power Company (MEPCO) and Islamabad Electric Supply Company Ltd. (IESCO) filed their petitions in August 2007 whereas Quetta Electric Supply Company (QESCO) filed its petition for determination of security deposit rates in February 2008. Gujranwala Electric Power Company (GEPCO), Hyderabad Electric Supply Company (HESCO) and Peshawar Electric Supply Company (PESCO) filed the requests for determination of security deposit rates along with their petitions for the determination of consumer-end tariff for the FY 2008-09.
- 1.3 The requests for determination of the security deposit rates were based inter-alia on the following ground:
 - i) That electricity is sold to the consumers on credit basis and it takes about two and half months time to disconnect the supply if some default is committed by a consumer;
 - ii) That security deposit is taken from the consumers to cover risk involved in credit sales.
- 1.4 As per the DISCOS, the above proposal is in accordance with the Clause (G) of Section 35 of the Electricity Act 1910, which requires the consumers to pay security deposit **not exceeding** the amount of average bill for the period of two and half months. Further that the security deposit rates were calculated on the basis of estimated load factor for different categories of consumers. According to DISCOs the amount of security deposit rates was revised from time to time taking into account the revision of electricity rates and since November, 1997, no revision in that regard has been made.
- 1.5 The Authority while determining the consumer-end tariff of DISCOs for the FY 2008-09 also approved the security deposit rates as were requested by the DISCOs. The rates for one of the DISCOS, i.e., Hyderabad Electric Supply Company were highest and the same was strongly contested by the consumers. In view thereof HESCO filed a motion for leave for review and



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sought downward revision of the approved security deposits rates. The hearing in the matter was held on 21st January 2009. During the hearing HESCO could not provide rationale of the revised proposed rates; therefore the Authority decided to adjourn the hearing and directed HESCO to submit its request along with proper rationale and justification for consideration.

- 1.6 The tariff determinations of MEPCO, GEPCO and LESCO pertaining to the FY 2008-09 and bi-annual adjustments for FESCO were challenged by different consumers including All Pakistan Textile Mills Association (APTMA) through a number of writ petitions before the Lahore High Court, Lahore. While observing certain procedural irregularities in the said determinations, the Honorable Lahore High Court, Vide its judgment dated 17th April, 2009 remanded the matters back to NEPRA for a decision afresh. The determination of security deposit rates was also one of the issues in those proceedings, and enhancement in the security deposit rates was strongly contested by the different interveners particularly the industrial consumers.
- 1.7 Pursuant to the directions of the Honorable Court, fresh tariff determinations were issued by NEPRA on 4th September 2009. The post remand proceedings were relevant only for four DISCOs whereas the question of determination of security deposit rates was relevant for all the DISCOs. In view thereof the Authority in its determinations date 4th September 2009 decided to consider the issue of revision of security deposit rates separately.
- 1.8 In order to cover credit risk of sales to the extent of two and half month billing, the DISCOs requested;
 - i) To enhance security deposit rates in accordance with the increased consumer-end tariff;
 - ii) To allow to recover enhanced security deposit rates from customers applying for new connections, reconnection or extension of load
 - iii) To allow to recover enhanced security deposit rates from existing customer whose security deposit has become insufficient to cover two and half month billing
 - iv) To allow revision of the security deposit rates every year in July on the basis of last twelve months average consumption and new tariff, if any.

Alternatively, in case the proposal of two and half month billing is not feasible then the existing security deposit rates (effective since 1st November 1997) may be enhanced on the basis of %age increase in the electricity tariff effective in November 1997 till date.

2. Issues/hearing

- 2.1 In order to arrive at a just and informed decision, the Authority had decided to conduct a hearing into the matter for which purpose date of hearing was fixed as 17th February, 2010, which was subsequently re-scheduled for 23rd February, 2010. The notice of rescheduled



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hearing was published in the leading national newspapers on 6th of February, 2010. The Authority also framed the following issues for the purposes of hearing:-

- To revise the security deposit rates to cover the non-payment risk for the credit period;
- The revised security deposit rates to apply on new connection, reconnection, extension of load, change of name, change of tariff category;
- The security deposit rates to be adjusted annually in July on the basis of average of last twelve months consumption and billing;
- Mode of payment whether in the form of cash, cheque or bank guarantee

2.2 The hearing was held on 23rd February 2010, which was attended by the representatives of Ministry of Water & Power, Ministry of finance and representatives of XWDISCOs., M/s Shumail Butt, Shiraz Ahmad and Faaiz Ahmad, Advocates represented the Government of Khyber Pakhtunkhawa. One Mr. Khalid Javaid also participated on behalf of Khadim Steel Industries.

2.3 Based upon the submissions made by the parties during the course of hearing and on the basis of available record, issue-wise findings of the Authority is given as under:-

3. Issue # 1. To revise the security deposit rates to cover the non-payment risk for the credit period

3.1 Prior to the conduct of hearing, different options for the revision of security deposits were circulated to all the Ex-WAPDA DISCOs for comments. DISCOs were also asked to add any option/proposal in the given circumstances. The following mechanism for the calculation of security deposits rates was broadly agreed by the DISCOs.

Load in KW x Load Factor % x NEPRA determined Rate Rs./Kwh $\times (1-L_t)/(1-L_{tech})$ x No. of months (in hours)

Where,

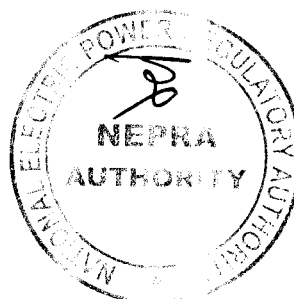
Load in KW = For the purpose of calculating security deposit rates on per KW basis, load in kW has been kept as 1.

L_t = Target Losses for the FY 2009-10

L_{tech} = Technical Losses as per UoSC

3.2 On the above mechanism, the following further issues were evolved for further consideration and evaluation;

- Consumer category wise load factors.
- NEPRA determined adjusted Tariff based on technical losses; and



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- Period of billing for security purpose
- Uniformity of security deposit rates across Pakistan.

Issue 1.1 # ; Consumer category wise load factor.

3.3 In order to minimize the variance in the security deposits across DISCOs, the following uniform load factors for different consumer categories were proposed and discussed.

Residential

Urban	20%
Rural	10%

Commercial

Urban	20%
Rural	10%

Industrial

B1	25%
B2	35%
B3	60%
B4	80%

Single Point

C1	25%
C2	35%
C3	50%

Agriculture 40%

Street Lights 40%

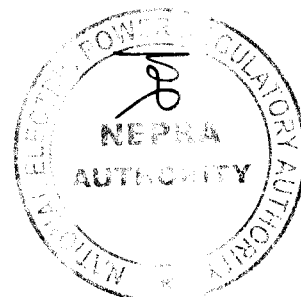
Tariff – H 20%

Tariff – I 50%

3.4 Only FESCO initially objected to the proposed load factors but while submitting its written comments on the subject matter, it also conceded to the NEPRA's proposed load factors.

Issue 1.2 # ; NEPRA determined adjusted Tariff based on technical losses ,

3.5 In order to bring the determined consumer-end tariffs of DISCOs at normal level, the extra ordinary items like prior quarter's adjustments, which are not relevant for the determination of security deposit rates was excluded from the consumer-end rates determined for the 1st Quarter of the FY 2009-10. In addition to this, the rates were further adjusted on the basis of respective technical losses (as per UoSC) for each DISCO thus, reducing the inherent distortions in the tariff.



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Issue # 1.3; Billing Period for the Security Deposit Rates

3.6 During the course of hearing, some of the DISCOs referred the notification No. PRAB-1-20/69, dated 31st March, 1970, issued under clause “G” section 35 of the Electricity Act 1910 of the Government of West Pakistan, which allowed recovery of security deposits **not exceeding** the amount of average bill for a period of two and a half months from the consumers of different categories. LESCO presented its case in detail and while justifying 2.5 month billing average to be used for determining security deposit rates to cover its credit risk, the following breakup of credit period was provided by LESCO:

Description	Unit	MDI	General
Consumption 30 days	Days	30	30
Meter reading	Days	1	1
Follow up	Days	0	2
Preparation of reading list sub division	Days	0	2
Submission of reading list to RO by sub division	Days	1	1
Data entry of meter reading by RO	Days	1	2
Verification of exception / error if any	Days	0	2
Submission of reading record to computer center by RO	Days	1	1
Printing of bill	Days	1	2
Delivery of printed bill to RO	Days	1	1
Distribution of bill to customer	Days	1	1
Payment period	Days	15	7
Receipt of bank scroll in RO	Days	3	3
Scrutiny of bank scroll by RO	Days	2	2
Submission of verified scroll to computer center by RO	Days	1	1
Posting of cash by computer center	Days	2	2
Scrutiny of defaulter list computer center	Days	1	1
Printing of notice to defaulters	Days	1	1
Receipt of defaulter notice from computer center to RO	Days	1	1
Scrutiny of defaulter list by RO	Days	1	1
Delivery of printed default notice to customer	Days	1	1
Notice period	Days	10	10
Total	Days	75	75

3.7 LESCO in support of its request for 2.5 months billing also referred International Practice according to which Gujrat Electricity Regulatory Commission (India) and Bangladesh Water & Power Development Board allowed 90 days (three months) billing while Erie Thames Powerlines (Canada), Ontario Energy (Toronto), London Hydro (London), Peterborough



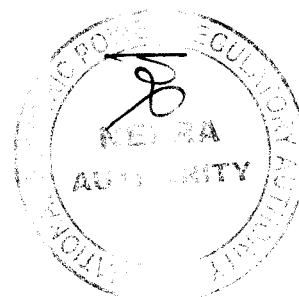
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Utilities Group (Ontario), Hydro One Brampton and Chatham-kent Hydro's allowed 75 days (2.5 months) billing as security deposit.

- 3.8 FESCO requested to use 53 days average billing for each consumer category for security deposit instead of one months billing. The break-up of the aforementioned days are provided as under;
- Meter reading of consumer is done on 31st day of the month
 - Billing process and issuing of bill to the consumer takes 5 working days.
 - Currently consumer is given 10 days, which could be reduced to 7 days.
 - If consumer does not pay the bill, the notice of disconnection would take 10 further days.
- 3.9 The interveners strongly opposed the DISCOs proposed 2.5 months average billing to be used as a basis for determining security deposit.
- 3.10 Having considered the arguments, the rationale for security deposit and the international practices to cover the risk of credit sales, the Authority is convinced that the DISCOs were able to make their case for revising security deposit rates. However, the argument to cover the risk of credit sales solely through security deposit is not valid. As per documents required for new connection/extension and reduction of load or change of name in terms of Chapter 2.3 (b) & (h) of the Consumer Service Manual, the risk of credit sales transfers to the third party, i.e., Owner of the premises or purchaser of the property. Currently DISCOs are functioning in a monopolized environment and in case of default the connection of the premises, if disconnected, cannot be restored till the outstanding dues are paid. Electricity in today's life is a basic necessity and the consumers cannot afford to live without it and as per referred Chapter of Consumer Service Manual, the risk transfers to the occupant of the premises. Moreover, 100% recoveries of credit sales through security deposit is not possible as the malafide intentions of a defaulting consumer cannot be foreseen and the inherent business risk still exists. It could only be used as deterrence on the part of consumers. Thus, the contention to cover the risk of credit sales solely through security deposit is not justified.
- 3.11 The Authority is of the opinion that by accepting LESCO's request as such would tantamount to the out right rejection of any potential for the improvement in DISCO's credit control functions and fixing high security deposit rates on the basis of 2.5 months billing period would unnecessarily block the money of the consumers and keeping this money idle is a sheer wastage of scarce sources, which in the present economic conditions of the country are neither justified nor acceptable.



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3.12 In view of above discussion, and the fact that setting higher security deposit rates would make basic commodity electricity inaccessible for an ordinary Pakistani, the Authority considers that one month average billing is reasonable for determining security deposit rates. The Annex – I of the determination shows different security deposit rates for different DISCOs, worked out by the using the aforementioned rationale (Here it is pertinent to mention that differential security deposit rates across DISCOs are **not determined** security deposit rates as it only explains the very basis of the calculations, whereas the last column of Annex – I, shows the Authority’s determined security deposit rates for all DISCO , as discussed below in issue # 1.4)

Issue # 1.4 ; Uniformity of security deposit rates across all the DISCO’s

3.13 During the hearing, the DISCOs as well as the interveners reiterated the need of uniform security deposit rates across all the DISCOs in Pakistan. Since the rates of each DISCO are different therefore the formula under consideration gives different security deposit rates for different DISCOs. The Authority further considers that since this is a transitional phase therefore initially the security deposit rates can be maintained uniform. Accordingly the Authority has decided to average out the security deposit rates of all the DISCOs (including KESC) in order to arrive at uniform rates. In view of aforementioned, the security deposit rates for each consumer category have been determined and are attached as **Annex-I (last column)** .

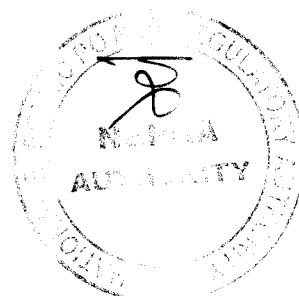
4. Issue # 2. The revised security deposit rates to apply on new connection, reconnection, extension of load, change of name, change of tariff category

4.1 DISCOs also requested to allow to recover enhanced security deposit rates;

- from the customers applying for new connections, reconnection or extension of load new connections;
- from the existing customers whose security deposit has become insufficient to cover two and half month billing;

4.2 During the hearing, the interveners strongly opposed the retrospective application of new security deposit rates; whereas LESCO insisted application of new security deposits rates to the exiting customers as well. According to LESCO the existing security deposit rates were too low, which did not cover the entire credit sale risk as a result of increased consumer-end tariff.

4.3 The Authority has carefully considered LESCO’s argument and is of the view that due to the reasons discussed above, it finds no justification for additional recovery from the existing consumers on the basis of enhanced security deposit rates. The Authority is also of the opinion that LESCO has totally ignored the time value of money as security has been retained by the DISCO for more than a decade. Moreover, LESCO has also not provided risk analysis



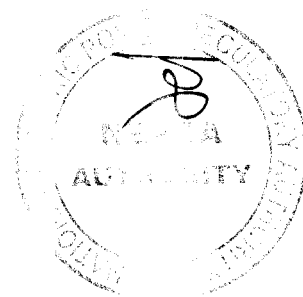
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based on consumers' paying as well as default history. In view thereof, the request for allowing recovery of security deposit based on the enhanced rates from the existing consumers is not accepted.

- 4.4 The Authority however, considers that the recovery of enhanced security deposits from the new connections, reconnections, change of name and change of tariff category is justified; therefore is accepted. Para 5.2(a) of Consumer Service Manual Chapter explains the options for transfer of security deposit rates in case of relocation of premises; change of name or through succession. Chapter 5.2 (b) of Consumer Service Manual also makes it mandatory that all consumers to update their security deposit in case of change of tariff, shifting of site and change of name.
- 4.5 The Authority is also of the view that for seasonal connections, the new rates would apply only if the deposit rates were refunded at the time of disconnection. As regards the application of enhanced security deposit rates to the cases of extension or reduction of load, the Authority do not agree with the request of recovery on the entire load. In Authority's opinion the additional security should be recovered to the extent of incremental load and not on the entire load.
5. **Issue # 3. The security deposit rates to be made adjustable annually on the basis of %age variation in average sale rate.**
 - 5.1 DISCOs requested to allow automatic adjustment in the rates of security deposits annually on the basis of %age variation in average sale rate.
 - 5.2 The Authority has considered DISCOs request and is of the view that for any modification or revision in the rates of security deposit rates a petition is required to be filed in accordance with the Tariff Standards and Procedure Rules – 1998. In view, thereof, the DISCOs request in this regard is not accepted.
6. **Issue # 4. Mode of payment whether in the form of cash, cheque and bank guarantee**
 - 6.1 During the hearing, the interveners requested to allow bank guarantees in lieu of cash considering the amounts that an industrial consumer particularly B-3 and B-4 would pay towards security deposits. DISCOs contended that record keeping of such documents for all the consumer categories would increase its administrative costs. Moreover, this document has limited life and is extendable only on consumer's request. DISCOs, however, in principle agreed to consider this option only in the case of big industrial consumers. FESCO, in its written comments, agreed to the option of Bank guarantee in lieu of cash but based on consolidated single load factor for B-3 and B-4 categories. FESCO also proposed that for any Bank guarantee submitted by the B-3 or B-4 consumer the validity period should be at least three years.




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- 7.1 Having considered the arguments of DISCOs and interveners the Authority allows the option of Bank guarantee for the industrial consumers under B-3 and B-4 categories only. The existing B-3 and B-4 category consumers can avail option of Bank Guarantees by withdrawing their previous security deposits from their respective DISCO's and submit a bank guarantee to the satisfaction of the DISCOS on new security deposit rates for a validity period of three years.


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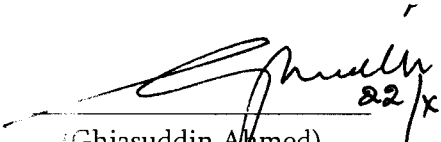
(Zafar Ali Khan) 21/10/10
Member



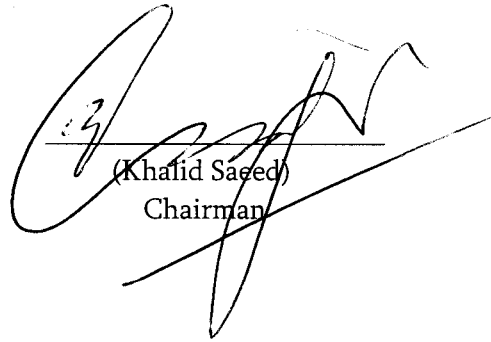
(Maqbool Ahmad Khawaja)
Member



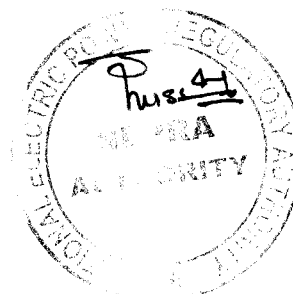
(Shaukat Ali Kundi) 22.10.2010
Member



(Ghiasuddin Ahmed) 22/x
Member/Vice Chairman

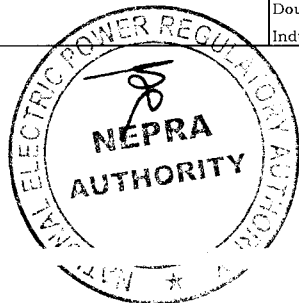


(Khalid Saqeb)
Chairman



Annex-I

Description	IESCO	LESCO	GEPCO	FESCO	MEPCO	PESCO	HESCO	QESCO	Average Security Deposit Rates determined for all DISCOS
	Security Deposit Rates as per para (3.1) & (3.12)	Security Deposit Rates as per para (3.1) & (3.12)	Security Deposit Rates as per para (3.1) & (3.12)	Security Deposit Rates as per para (3.1) & (3.12)	Security Deposit Rates as per para (3.1) & (3.12)	Security Deposit Rates as per para (3.1) & (3.12)	Security Deposit Rates as per para (3.1) & (3.12)	Security Deposit Rates as per para (3.1) & (3.12)	
Residential									
Urban	Rs. 1,100 / kW	Rs. 1,200 / kW	Rs. 1,100 / kW	Rs. 1,200 / kW	Rs. 1,100 / kW	Rs. 1,100 / kW	Rs. 1,300 / kW	Rs. 1,300 / kW	Rs. 1,220 / kW
Rural	Rs. 500 / kW	Rs. 600 / kW	Rs. 600 / kW	Rs. 600 / kW	Rs. 600 / kW	Rs. 600 / kW	Rs. 600 / kW	Rs. 600 / kW	Rs. 610 / kW
Commercial A-2									
Urban per Kw	Rs. 1,600 / kW	Rs. 1,700 / kW	Rs. 1,800 / kW	Rs. 1,800 / kW	Rs. 1,900 / kW	Rs. 1,700 / kW	Rs. 1,700 / kW	Rs. 2,000 / kW	Rs. 1,810 / kW
Rural per Kw	Rs. 800 / kW	Rs. 900 / kW	Rs. 900 / kW	Rs. 900 / kW	Rs. 1,000 / kW	Rs. 900 / kW	Rs. 900 / kW	Rs. 1,000 / kW	Rs. 920 / kW
Industrial									
B1	Rs. 1,400 / kW	Rs. 1,500 / kW	Rs. 1,500 / kW	Rs. 1,600 / kW	Rs. 1,600 / kW	Rs. 1,500 / kW	Rs. 1,500 / kW	Rs. 1,600 / kW	Rs. 1,580 / kW
B2	Rs. 1,800 / kW	Rs. 1,800 / kW	Rs. 1,900 / kW	Rs. 1,900 / kW	Rs. 2,000 / kW	Rs. 1,900 / kW	Rs. 1,900 / kW	Rs. 2,100 / kW	Rs. 2,010 / kW
B3 -	Rs. 2,900 / kW	Rs. 2,500 / kW	Rs. 2,400 / kW	Rs. 3,100 / kW	Rs. 2,300 / kW	Rs. 2,800 / kW	Rs. 2,500 / kW	Rs. 2,900 / kW	Rs. 2,890 / kW
B4	Rs. 3,600 / kW	Rs. 3,100 / kW	Rs. 2,500 / kW	Rs. 3,400 / kW	Rs. 3,000 / kW	Rs. 3,500 / kW	Rs. 3,200 / kW	Rs. 3,900 / kW	Rs. 3,560 / kW
Single Point Supply for further distribution									
C1(a) Supply at 400 Volts - less than 5 kW	Rs. 1,600 / kW	Rs. 1,600 / kW	Rs. 1,600 / kW	Rs. 1,700 / kW	Rs. 1,700 / kW	Rs. 1,600 / kW	Rs. 1,500 / kW	Rs. 1,700 / kW	
C1(b) Supply at 400 Volts -exceeding 5 kW	Rs. 1,600 / kW	Rs. 1,600 / kW	Rs. 1,600 / kW	Rs. 1,700 / kW	Rs. 1,700 / kW	Rs. 1,600 / kW	Rs. 1,500 / kW	Rs. 1,700 / kW	Rs. 1,670 / kW
C2 Supply at 11 kV	Rs. 2,000 / kW	Rs. 1,500 / kW	Rs. 2,000 / kW	Rs. 2,200 / kW	Rs. 2,100 / kW	Rs. 2,100 / kW	Rs. 1,900 / kW	Rs. 2,200 / kW	Rs. 2,080 / kW
C3 Supply above 11 kV	Rs. 2,800 / kW	Rs. 2,900 / kW	Rs. 2,800 / kW	Rs. 3,100 / kW	Rs. 2,900 / kW	Rs. 2,900 / kW	Rs. 2,700 / kW	Rs. 3,100 / kW	Rs. 2,740 / kW
Agricultural Tube-wells - Tariff D									
Agricultural Tube-wells (including scrap)	Rs. 15000 lump sum	Rs. 15000 lump sum	Rs. 15000 lump sum	Rs. 15000 lump sum	Rs. 15000 lump sum	Rs. 15000 lump sum	Rs. 15000 lump sum	Rs. 15000 lump sum	Rs. 15000 lump sum
Public Lighting - Tariff G	Rs. 3,400 / kW	Rs. 3,200 / kW	Rs. 3,300 / kW	Rs. 3,400 / kW	Rs. 3,200 / kW	Rs. 2,600 / kW	Rs. 2,800 / kW	Rs. 3,300 / kW	Rs. 3,240 / kW
Tariff H - Residential Colonies attached to industries	Rs. 1,700 / kW	Rs. 1,600 / kW	Rs. 1,600 / kW	Rs. 1,700 / kW	Rs. 1,600 / kW	Rs. 1,300 / kW	Rs. 1,400 / kW	Rs. 1,600 / kW	Rs. 1,560 / kW
Special Contracts - Tariff K (AJK)	Rs. 2,400 / kW		Rs. 2,600 / kW			Rs. 2,700 / kW			Rs. 2,570 / kW
Traction - 1		Rs. 610 / kW			Rs. 610 / kW				Rs. 610 / kW
Special Contracts - Tariff K (Rawat)	Rs. 2,900 / kW		Rs. 2,900 / kW			Rs. 2,900 / kW			Rs. 2,900 / kW
Tariff - F (Seasonal)	Double of Regular Industrial Rate	Double of Regular Industrial Tariff	Double of Regular Industrial Tariff	Double of Regular Industrial Tariff	Double of Regular Industrial Tariff	Double of Regular Industrial Tariff	Double of Regular Industrial Tariff	Double of Regular Industrial Tariff	



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