Before

UTTARAKHAND ELECTRICITY REGULATORY COMMISSION

Petition No. 07 of 2015

In the matter of:

Application seeking approval of the Commission on the draft Power Purchase Agreement between Uttarakhand Power Corporation Ltd. and selected bidders for setting of Grid Connected Solar PV Power Projects.

In the matter of:

Uttarakhand Power Corporation Ltd. …Petitioner

AND

Uttarakhand Renewable Energy Development Agency ...Respondent

CORAM

Shri Subhash Kumar	**Chairman**
Shri C.S. Sharma	**Member**
Shri K.P. Singh	**Member**

Date of Hearing: March 20, 2015

Date of Order: March 20, 2015

The Order relates to the Petition filed by Uttarakhand Power Corporation Ltd. (hereinafter referred to as "Petitioner" or "Licensee "or "UPCL") seeking approval of the draft Power Purchase Agreement to be executed with 12 Grid-Connected Solar PV Power Project developers selected through bidding process by Uttarakhand Renewable Energy Development Agency (hereinafter referred to as "Respondent" or "State Agency ") for implementation of the Grid-Connected Solar PV based Power Projects in the State of Uttarakhand.

1. Background

1.1 The Petitioner filed a Petition dated 13.03.2015 seeking approval of draft PPA to be executed with the 12 Solar PV based power project developers. The Petitioner, vide its Petition submitted that Government of Uttarakhand had notified the "Solar Energy Policy of Uttarakhand-2013" on 27.06.2013 and in accordance with the said policy, proposals were to be invited by GoU/UREDA from time to time for selection of Solar Power Project through tariff based competitive bidding process.

1.2 UPCL also submitted that as per UERC (Tariff and Other Terms for Supply of Electricity from Non-conventional and Renewable Energy Sources) Regulations, 2013, (hereinafter referred to as "RE Regulations, 2013") it was obligated to fulfill the Solar RPO. The year wise expected quantum of Solar RPO as submitted by the licensee is given hereunder:-

Financial Year	**Predicted Quantum of Solar RPO Deficit by UPCL (MW)**
2014-15	2
2015-16	5
2016-17	23

1.3 The licensee submitted that it had authorized the State Agency for initiating the competitive bidding for 30 MW capacity in first phase for setting up of Solar Power Project (SPP) under category Type-I of "Uttarakhand Solar Power Policy-2013" so that it would be able to comply with the Solar RPO for FY 2016-17. Accordingly, UREDA after the competitive bidding process provided the list of selected bidders to UPCL for alongwith the tariff rates quoted by 12 project developers.

1.4 UPCL also referred to the Regulation 2(3) of UERC (Tariff and Other Terms for Supply of Electricity from Non-conventional and Renewable Energy Sources) Regulations, 2013 which stipulates that distribution licensee shall invite bids from generators/developers for procurement of power from these generators/developers in respect of Solar PV and Solar Thermal power projects and the licensee shall enter into a PPA with the generators/ developers bidding tariff lower than the generic tariff specified in the RE Regulations, 2013.

1.5 The Petitioner submitted that it is desirous of purchasing the entire energy on the terms and conditions as agreed between both the parties as per the terms and condition laid down in draft Power Purchase Agreement as submitted with the Petition.

1.6 A copy of the Petition was forwarded to UREDA being the nodal agency/representative of Solar PV based project developers so that, it may be able to raise issues/observations, if any, on the draft PPA before the Commission. The Commission held a hearing on 20.03.2015 wherein, UPCL & UREDA were heard in the matter.

1.7 UREDA during the hearing and vide its written submission dated 19.03.2015 submitted that it was the nodal agency for implementation of "Uttarakhand Solar Power Policy-2013" and to meet UPCL's requirement of meeting mandated Solar-RPO, it had issued a draft RfP on 20.08.2014 for selection of Solar PV based project developers. UREDA submitted that total 62 bids were received against which 58 were shortlisted by Technical Appraisal Committee (TAC), thereafter, financial bids of shortlisted bidders were opened on 05.11.2014 by TAC. UREDA submitted that Project Approval Committee constituted under "Solar Policy of Uttarakhand- 2013" shortlisted and selected 12 numbers of companies which have quoted a tariff of Rs 7.99 per kWh or below. UREDA submitted that Letter of Award (LoA) have been issued to these bidders on 13.01.2015. In addition, UREDA submitted its comments on draft PPA submitted by UPCL for approval of the Commission which are as under:

1.7.1 UREDA submitted that adequate payment security should be made available to the selected bidders by way of Letter of Credit (LC) and Letter of Credit backed by credible escrow mechanism. UREDA submitted that this type of mechanism was also acceptable under Regulation 22 of the RE Regulations, 2013. UREDA has also submitted a copy of PPA dated 30.12.2013 executed between one of the selected bidders under the bidding process and Punjab State Power Corporation Limited as selected by Energy Development Agency (PEDA). UREDA has submitted that in the said PPA payment security mechanism has also been covered.

1.7.2 UREDA also submitted that as per the Clause no. 2.26 & 2.10.3.1 of the RfP, the selected bidders have been given 240 days from the date of LoI (210 days from the date of issue of Letter of Allotment) for achieving the financial closure of the project, finalization of land and grant of grid connectivity. The Respondent submitted that the change in the location of land from one place to other location is not permitted after 240 days from the date of LoI (210 days from the date of issue of Letter of Allotment). The State Agency also submitted that the final point of interconnection could only be finalized after finalization of land, hence, bidders should be allowed to change their Point of Interconnection as declared in the PPA within 210 days from the date of issue of Letter of Allotment.

1.7.3 The State Agency further submitted that in accordance with the provision of Regulation 15(1)(b) of RE Regulations, 2013 normative levelised tariff of 12 paise/unit over and above the generic tariff determined at the point of inter-connection of the solar power project should be covered under the PPA.

1.7.4 UREDA also pointed out that the words "hydro power plant" in clause 1.4, 1.7 etc. of PPA should be replaced with the words "Solar PV Power Plant". UREDA also submitted that at Clause 20.2 of PPA, 19.1 should be replaced with 20.1.

1.8 During the hearing the Commission asked UREDA whether projects have been finally awarded to the developers and also enquired about the locations of the projects to be implemented by the developers. UREDA submitted that they have awarded the projects vide their LoA dated 13.01.2015 to 12 project developers, however, sites for construction of plants are tentative and it would be finalized after getting sanctions from financial institutions subsequent to the execution of PPA with the licensee.

1.9 The Commission asked UPCL to respond on the issues raised by UREDA in the matter. In this regard, representatives of UPCL submitted that they do not have any objection in implementation of LC mechanism for payment of energy bills. UPCL also agreed to incorporate provision of normative levellised tariff of 12 paise/unit in accordance with Regulation 15(1)(b) of RE Regulations, 2013. However, UPCL contended that non-finalisation of plant locations is a major cause of concern as licensee shall have to carry-out process of identification of grid-connected sub-stations for evacuation of power generated through such plants. In this regard, the Commission directed both the parties for resolving the issue of finalization of location of plant, identification of grid-connected sub-stations and all the related issues amicably in accordance with applicable rules and regulations.

2. Commission's Views & Decisions

2.1 Legal Requirement for approval of PPA

2.1.1 A PPA is a legal document incorporating operational, technical & commercial provisions to be complied in accordance with the relevant rules & regulations.

2.1.2 Section 86(1)(b) of the Electricity Act, 2003 stipulates that one of the function of the Commission is to regulate electricity purchase and procurement process of distribution licensees including the price at which electricity shall be procured from the generating companies or licensees or from other sources through agreements for purchase of power for distribution and supply within the State.

2.1.3 Further, the Distribution and Retail Supply Licence issued by the Commission lays down certain conditions of license, which amongst others also has the following:

"5.1 The Licensee shall be entitled to:

(a) …

(b) ***Purchase, import or otherwise acquire electricity from any generating company or any other person under Power Purchase Agreements or procurement process approved by the Commission****;*

…"

(Emphasis added)

2.1.4 Regulation 39 of UERC (Conduct of Business) Regulations, 2014 specifies as under:

"(1) The distribution licensee shall file with the Commission in complete form copies of all Power Purchase Agreements already entered into by it.

(2)The distribution licensee to establish to the satisfaction of the Commission that the purchase of power by it is under a transparent power purchase procurement process and is economical and the power is necessary to meet its service obligation.

(3) ***The Distribution licensee shall apply to the Commission for approval of the draft Power Purchase agreement that it proposes to enter into with the suppliers. The Commission may pass orders:***

(a) Approving the agreement; or
(b) Approving the agreement with modifications proposed to the terms of the agreement; or
(c) Rejecting the agreement"

(Emphasis added)

2.1.5 Regulation 2(3) of the RE Regulations, 2013 requires that:

"The generic tariff specified for Solar PV and Solar Thermal power projects under these Regulations shall be the maximum tariff and the distribution licensee shall invite bids from generators/developers for procurement of power from these generators/developers. The distribution licensee shall enter into a PPA with the generators/developers bidding lower tariff."

Hence, the above provision allows purchase of solar power by the licensee based on competitive tariff bidding which shall be lower than the generic tariff specified in the RE Regulations, 2013.

2.1.6 Further, Regulations 7(2) & 7(3) of both the UERC (Tariff and other Terms for Supply of Electricity from Non-Conventional and Renewable Energy sources) Regulations, 2013 specifies as under:

"(2) The distribution licensee on an offer made by the said RE based Generating Stations and Co-generating Stations shall enter into a power purchase agreement in conformity with these Regulations and relevant provisions of other Regulations and the Act. The distribution licensee shall sign the PPA within two months of offer made by the generating company, failing which the generating company may approach the Commission for suitable remedy.

(3) ***The distribution licensee shall make an Petition for approval of power purchase agreement entered into with the generating station in such form and manner as specified in these regulations and Uttarakhand Electricity Regulatory Commission (Conduct of Business) Regulations, 2004 as amended from time to time****."*

(Emphasis added)

2.1.7 In view of the above, in accordance with the requirement of the Act and Regulations referred above, UPCL as a distribution licensee is required to seek approval of the PPAs entered or proposed to be entered by it from the Commission. Accordingly, draft PPA to be executed between UPCL and 12 successful bidders selected by UREDA is being examined for consistency and conformity with the relevant provisions of the Electricity Act, 2003 & RE Regulations, 2013.

2.2 Commission's Analysis of the Draft PPA and Order on the same

2.2.1 Details of 12 successful bidders selected for implementation of grid-connected Solar PV based Power Projects for sale of power to the licensee are as follows:

S. No.	Name of Developer	Project Capacity	Rate
1	Sh. Rakesh Gupta, M/s Eastman International	0.636 MW	Rs. 7.99/kWh
2	Sh. Rajesh Kumar, M/s R.C. Energy	1 MW	Rs. 7.98/kWh
3	Sh. Sunil Agarwal, M/s Purshotam Ispat	1 MW	Rs. 7.96/kWh
4	Sh. Mudit Garg, M/s Vivan Solar Pvt. Ltd.	3.5 MW	Rs. 7.93/kWh
5	M/s Sunil Agarwal, M/s Purshotam Ispat	1 MW	Rs. 7.88/kWh
6	Sh. Sanjay Mittal, M/s UJVN Ltd.	4.398 MW	Rs. 7.80/kWh
7	Sh. Sanjay Mittal, M/s UJVN Ltd.	1.466 MW	Rs. 7.75/kWh

S. No.	Name of Developer	Project Capacity	Rate
8	Sh. Amit Khurana, M/s Madhav Infra Projects Ltd.	12 MW	Rs. 7.74/kWh
9	Sh. Ashish Karenwal, M/s Purhsotam Industries Ltd.	1 MW	Rs. 7.73/kWh
10	Sh. Ashish Karenwal, M/s Purshotam Industries Ltd.	1 MW	Rs. 7.71/kWh
11	Sh. Vipin Mittal, M/s Advika Energies (P) Ltd.	1 MW	Rs. 7.56/ kWh
12	Sh. Abhishek Singh, M/s Redwoods Projects Pvt. Ltd.	2 MW	Rs. 6.85/ kWh

2.2.2 The draft PPA submitted by UPCL has been examined in light of the relevant rules & regulations. The Commission observed that certain clauses in the draft PPA submitted by UPCL are inconsistent with the provisions of Act/Regulation. Such observations have been discussed in the subsequent sub-Paras. UPCL is required to take note of the same and incorporate necessary corrections in the draft PPA while executing the PPA with the project developers.

a. The Commission observes that certain fields such as details of project & project developer, applicable tariff, grid connecting sub-station, details of allotment of projects by UREDA etc. in draft PPA and annexure thereof have been left blank. The same is required to be duly filled at the time of execution of the PPA.

b. Clause 1.3 of the draft PPA provides for definition of "Date of commercial operation or Commissioning (CoD)". The said definition requires that the Solar PV based generator will have to demonstrate the maximum continuous rating within three years of commissioning. This provision of the draft PPA is not in accordance with the definition of CoD specified in the RE Regulations, 2013 as the demonstration of maximum continous rating within three years of commissioning is only for SHP's in the RE Regulations, 2013. The definition of CoD specified in Regulation 3(1)(l) is as under:

"Date of commercial operation or Commissioning (CoD)" in relation to a unit means the date declared by the generator on achieving maximum continuous rating through a successful trial run and in relation to the generating station, the date of commercial operation means the date of commercial operation of the last unit or block of generating station and expression "commissioning" shall be construed accordingly. In case of Small Hydro Plants the date of commissioning shall, however,

not be linked to achieving maximum continuous rating, but the generator will have to demonstrate the same within three years of commissioning."

Hence, the definition should be corrected in accordance with the Regulation 3(1)(l) of the RE Regulations, 2013.

c. Clause 1.4 & 1.7 of the draft PPA defines "Export Meter" & "Import Meter" respectively wherein, words "Hydro power plant" is appearing after the words "Solar Photovoltaic Power Plant's" and is misplaced and requires to be removed.

d. Clause 2.1 of the draft PPA provides for the rate of sale of power from Solar PV based projects in accordance with the tariff decided through bidding process. UREDA in its response has submitted that the additional tariff of 12 paise /kWh should be allowed in addition to the tariff quoted by the developer in accordance with Regulation 15(1)(b) of the RE Regulations which is as follows:

"(b) In case, the generating company opts to construct the evacuation infrastructure from point of inter-connection to the nearest sub-station of transmission or distribution licensee to which the generating station is connected, it shall be allowed a normative levelised tariff of 5 paise/unit over and above the generic tariff determined at the point of inter-connection. However, in case of a solar generating company a normative levelised tariff of 12 paise/unit over and above the generic tariff determined at the point of inter-connection shall be allowed. The said normative tariff for evacuation infrastructure has been arrived at considering the cost of normative line length of 10 kms. (including cost of terminal equipments) for different capacities of generating stations as per normative cost given below:

…"

The Commission is of the view that provision of additional levellised tariff of 12 paise/unit has been made for the projects which opts for construction of the evacuation infrastructure from point of inter-connection to the nearest sub-station of transmission or distribution licensee to which the generating station is connected. Further, the said provision has been incorporated in the RE Regulations for facilitating project developers to avoid undue bottling-up of generation in case of delay/denial to provide evacuation infrastructure by the licensee. It should not be construed as a right of additional benefit for project developers by way of implementation of such infrastructure.

Accordingly, the aforesaid provision should be incorporated only in those PPAs where developers opt to construct the evacuation infrastructure on denial/delay in construction of the same by the licensee.

e. Clause 2.4 of the draft PPA provides for minimum & maximum limits of CUF to be achieved by the projects in a contract year. It has been stipulated that the Solar PV based plant should have minimum CUF of 12% in any given contract year. Provision of penalty & incentive has been incorporated in the said Clause for CUF less than 10% or more than 22% in any contract year respectively. In this regard, UREDA during the finalization of draft document "Request for Proposal for Selection of Developer(s) for Setting of Grid Connected Solar PV Power Projects of 30MW Aggregate Capacity" vide its letter no. 1351/UREDA/03(1)-334/Solar Policy/2012-13 dated 16.09.2014 requested the Commission for relaxing the provision of CUF of 19% as mentioned in RE Regulations, 2013 and to allow minimum & maximum limits of CUF as 12% & 22% respectively. In this regard, the Commission vide its letter no. UERC/6/TF-208/14-15/2014/1197 dated 22.09.2014 had accepted UREDA's above proposal in the matter. Hence, the Commission does not find any reason for modification with regard to limits of CUF provided in the draft PPA. However, penalty & incentive should be decided with mutual consent of parties involved in the PPA.

f. Clause 5.3 of the draft PPA stipulates about the provisions relating to rebate for payment of monthly bills to the Generating Company by UPCL. UREDA has raised an issue regarding payment security mechanism by way of LC backed by credible escrow mechanism. In this regard, Regulation 22 of RE Regulations, 2013 stipulates that:

*"**22. Rebate***

(1) For payment of bills through the letter of credit on presentation, a rebate of 2% shall be allowed.

(2) Where payments are made by a mode other than through the letter of credit but within a period of one month of presentation of bills by the generating company, a rebate of 1% shall be allowed. "

Further, UPCL during the hearing agreed on making payment of energy bills by way of LC mechanism. The Commission is of the view that payment security mechanism should be mutually agreed to between the parties under the ambit of the provisions of RE Regulations, 2013. Accordingly, the aforesaid Clause of payment in the draft Model PPA should be revised, if required.

g. In Clause 5.7 of the draft PPA Clause 22 has been referred for Arbitration of disputes between UPCL and generator. "Clause 22" referred in Clause 5.7 is incorrect and it should be replaced by "Clause 23".

h. In Clause 5.7 of the draft PPA provision for payment of 50% of the disputed amount to be paid by UPCL has been made. However, it is not consistent with PPAs earlier submitted by UPCL wherein, payment of 100% disputed amount has been stipulated. Hence, the same should be based on mutual agreement by the purchaser and seller.

i. Clause 8.1 states about interconnection facility for the connection of the Solar PV Project subject to the feasibility of the connection at the respective sub-station provided by the Executive Engineer of the Concerned Division. This provision appears to be a unilateral decision to be made by the Executive Engineer of the Petitioner. It should be decided with mutual consent of both the parties involved in the PPA.

Further, Clause 8.1 of the draft PPA also provides for intimation by the project developer atleast 6 months prior to commissioning of the plant in case of change in location of the plant. UREDA has submitted that in accordance with the above referred RfP document project developers have been allowed time of 240 days from the date of LoI (210 days from the date of issue of Letter of Allotment) for achieving the financial closure of the project, finalization of land and grant of grid connectivity. Further, UREDA submitted that change in the location of land from one place to other location is not permitted after 240 days from the date of LoI (210 days from the date of issue of Letter of Allotment). UREDA also submitted that the final point of interconnection could only be finalized after finalization of land, hence, bidders should be allowed to change their point of interconnection as declared in the PPA within 210 from the date of issue of Letter of Allotment.

In this regard, the Commission is of the opinion that tariff decided through bidding process & being allowed in the PPA by the Commission have been restricted to the conditions as mentioned in subsequent Para of this Order, hence, both the parties involved in the PPA should decide a time frame within which finalization of suitable interconnection point be identified subject to technical as well as financial feasibility for the respective plants.

j. Clause 9.2 provides for installation of necessary equipments by Solar PV Plant for elimination of feeding reverse power from grid to Solar PV Plant in absence of any agreement for purchase of power with UPCL. This provision appears to be in contradiction with Regulation 45 of the RE Regulations, 2013 wherein billing procedure has been specified on net metering basis in case sale of entire energy is made to UPCL and the same needs review as the draft PPA is for sale to UPCL.

k. Clause 16.1 referred in Clause 17.4 of the draft PPA is incorrect and it should be replaced by Clause 17.1.

l. Clause 22 referred in Clause 20.1 of the draft PPA is incorrect and it should be replaced by Clause 21.

m. Clause 19.1 referred in Clause 20.2 of the draft PPA is incorrect and it should be replaced by Clause 20.1.

n. At point no. 3 of the Annexure-II to the draft PPA, words "state load dIndustries Ltd.ch centre" should be replaced by the words "State Load Dispatch Centre"

2.2.3 UPCL is directed to take note of the above observations and carry out the appropriate modification in the draft PPA before executing the same with the above mentioned 12 project developers. UPCL is also required to submit the PPA executed with such developers before the Commission within 15 days of the execution of PPA.

3. Applicability of the Order

3.1 Regulation 11 of the RE Regulations, 2013 provides that:

"11. Control Period or Review Period

(1) The Control Period or Review Period under these Regulations shall be of five years, of which the first year shall be the financial year 2013-14.

Provided that the benchmark capital cost for Solar PV, Solar thermal and grid interactive roof top and small solar PV projects may be reviewed annually by the Commission.

Provided further that the tariff determined as per these Regulations for the RE projects commissioned during the Control Period, shall continue to be applicable for the entire Tariff Period (Useful life of the plant) as specified under Regulation 3(1)(nn).

(Emphasis added)

In view of the above provision of the regulation, benchmark capital cost of Solar based projects was required to be reviewed by the Commission during FY 2014-15. However, UREDA had vide Petition dated 18.07.2014 sought clarification from the Commission on certain issues in implementation of "Uttarakhand Grid Interacted Rooftop and Small SPV Power Plants Scheme" under the RE Regulations, 2013. Through the aforesaid Petition UREDA had also requested to extend the prevailing benchmark capital cost and levelised tariff for excess energy fed into the grid for grid interactive small solar projects installed upto 31st March 2015. The Commission vide its Order dated 07.11.2014, in the matter decided as under:

"2.2.3 However, in view of submissions made by UREDA and UPCL in this regard, with a view to remove any uncertainty and also with an intent to promote the installations of grid interactive solar rooftop projects in the State which as of now is in initial stage, the Commission decides not to review or amend the benchmark capital cost for grid interactive roof top and small solar PV projects specified in the RE Regulations, 2013 till March 31, 2015 and consequently the tariffs for the same. Accordingly, if any consumer installs a grid interactive roof top and small solar PV plants by the end of March 31, 2015, and injects surplus power into the distribution system of UPCL he shall be eligible for tariffs as specified in RE Regulations, 2013 for such surplus injection into the grid."

3.2 Accordingly, the Commission did not consider review of the benchmark capital cost for grid interactive roof top and small solar PV projects during FY 2014-15. In order to have uniform policy in respect of all the Solar based plants the Commission decided not to review the benchmark capital cost of for Solar PV Based Plants & Solar Thermal Plants also for FY 2014-15. In the meantime UREDA, in accordance with "Solar Energy Policy of Uttarakhand-2013" initiated the process of selection of competitive tariff based Solar PV Project developers for implementation of projects within the State of Uttarakhand for sale of power to the distribution licensee i.e. UPCL.

3.3 UREDA based on tariff quoted in tender, selected 12 project developers and allotted the Solar PV based projects as listed in Para 2.2.1 above. It is apparent that the tariff claimed by the project developers for sale of power to UPCL are lower than that of the generic tariff specified in RE Regulations, 2013 for such projects. Further, as submitted by Petitioner, the Commission has also noted the fact, that being a licensee UPCL is required to comply with Solar-RPO and the solar power being generated in the state is estimated to be much less than required to meet the RPO prescribed due to inadequate development of such plants in the State.

3.4 In view of the facts and circumstances as discussed above, the Commission has decided to relax the stipulation made in Regulation 11(1) as reproduced above as the LoA was issued to the successful bidders in January 2015 and the gestation period for commissioning of a solar PV plant is atleast a year, hence, expecting them to commission the project by 31.03.2015 would not be practicable. The Commission therefore decides that the benchmark capital cost and generic tariffs thereof as ceiling tariffs, as provided in RE Regulations, 2013 shall remain applicable for these 12 developers of Solar PV Plants during FY 2015-16 and the tariff quoted by them shall apply subject to the condition that:

(a) They execute their PPA with UPCL by 31.03.2015, and

(b) They commission their projects on or before 31.03.2016.

Provided if these developers do not comply with the above conditions (a) & (b) both, tariff incorporated in the PPA entered into by UPCL & such project developers shall not be applicable, and in such cases rate of sale of power from such projects to the licensee shall be as may be determined by the Commission after reviewing the benchmark capital cost for Solar PV Plants as provided for in the RE Regulations, 2013 if such notified rates are lower than the tariffs agreed in the PPA. The proceedings for reviewing of the benchmark capital cost for solar plants are underway in the Commission. Accordingly, UPCL is directed to provide in clause 2.1 of the draft PPA that rate of sale of power shall be applicable on such developers who commission their plants on or before 31.03.2016, however if the plant is commissioned after 31.03.2016, the rate of sale of power would be as determined by the Commission for the year of commissioning if such rates are lower than the tariffs agreed to in the PPA otherwise tariffs agreed in the PPA shall continue.

4. With this, Petition no. 07 of 2015 stands disposed.

5. Ordered accordingly.

(K.P. Singh) **Member**	**(C.S. Sharma)** **Member**	**(Subhash Kumar)** **Chairman**