

D. Chattopadhyay
Under Secretary
Ministry of Power
Government of India

Date: September 29, 2020

Subject: Comments on the Draft Rules on Rights of Electricity Consumers

Dear Sir,

Kindly accept on record comments against draft Electricity (Rights of Consumers) Rules, 2020 notified by letter No. 23/05/2020 – R&R. The comments have been prepared by Bask Research Foundation and Consumer Unity & Trust Society (CUTS International)

Kind regards,

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Chief Executive Officer
Bask Research Foundation

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CUTS International

Comments on the Draft Electricity (Rights of Consumers) Rules 2020

Electricity distribution continues to be the one of the few sectors wherein consumers are poorly valued. While private sector investments are being encouraged to improve the quality of supply and services, true competition in the domain is unlikely to be realized in near future. Hence, introduction of ‘Rights of Consumers (and Prosumers)’ is a welcome step.

Consumers are central, not just for sustainable growth of power sector, but also climate goals. At the same time good quality electricity supply and services are essential for living comfort, economic growth and other essential services. Hence, given the essential nature of electricity supply and monopolistic nature of electricity distribution, principles of transparency, efficiency and accountability shall be enshrined within Electricity (Rights of Consumers) Rules, 2020. At the same time, it is pertinent that propose measures take into account the state of affairs prevalent on the ground, and actively strives to address such issues.

Through our experience and work in Rajasthan, we shall like to take this opportunity to apprise you of learnings from the ground. A randomized (rural) survey of 3000 consumers across Bikaner, Chittorgarh and Sawai Madhopur districts of Rajasthan indicated that consumers in general had poor understanding of electricity bills (refer Figure 1), and not even a single respondent was aware of Grievance Redressal Forums or Ombudsman. This indicates that level of awareness, especially amongst rural consumers, is very low. In such a scenario, even if rights of consumers are notified, their implementation shall remain poor as unaware electricity consumers are unlikely to demand their rights.

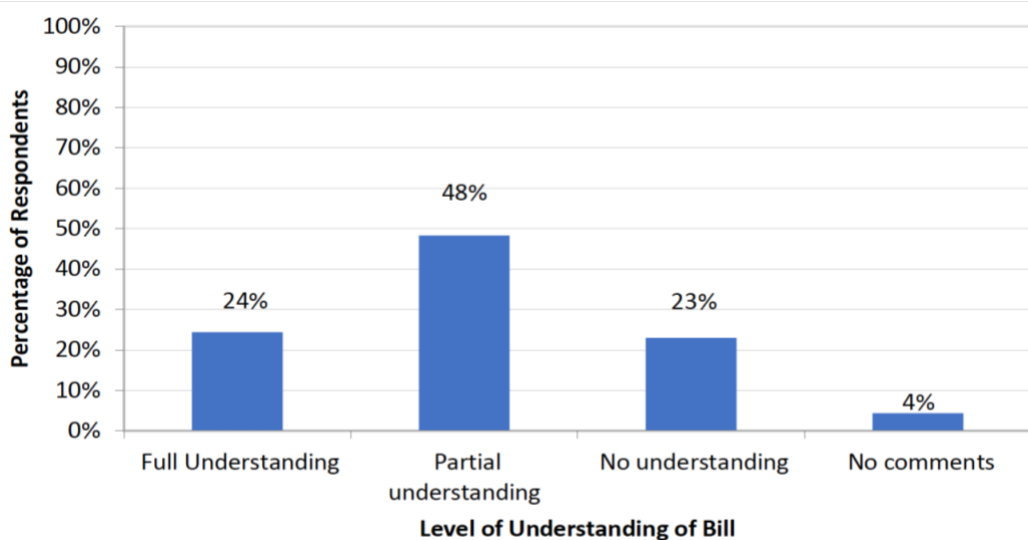
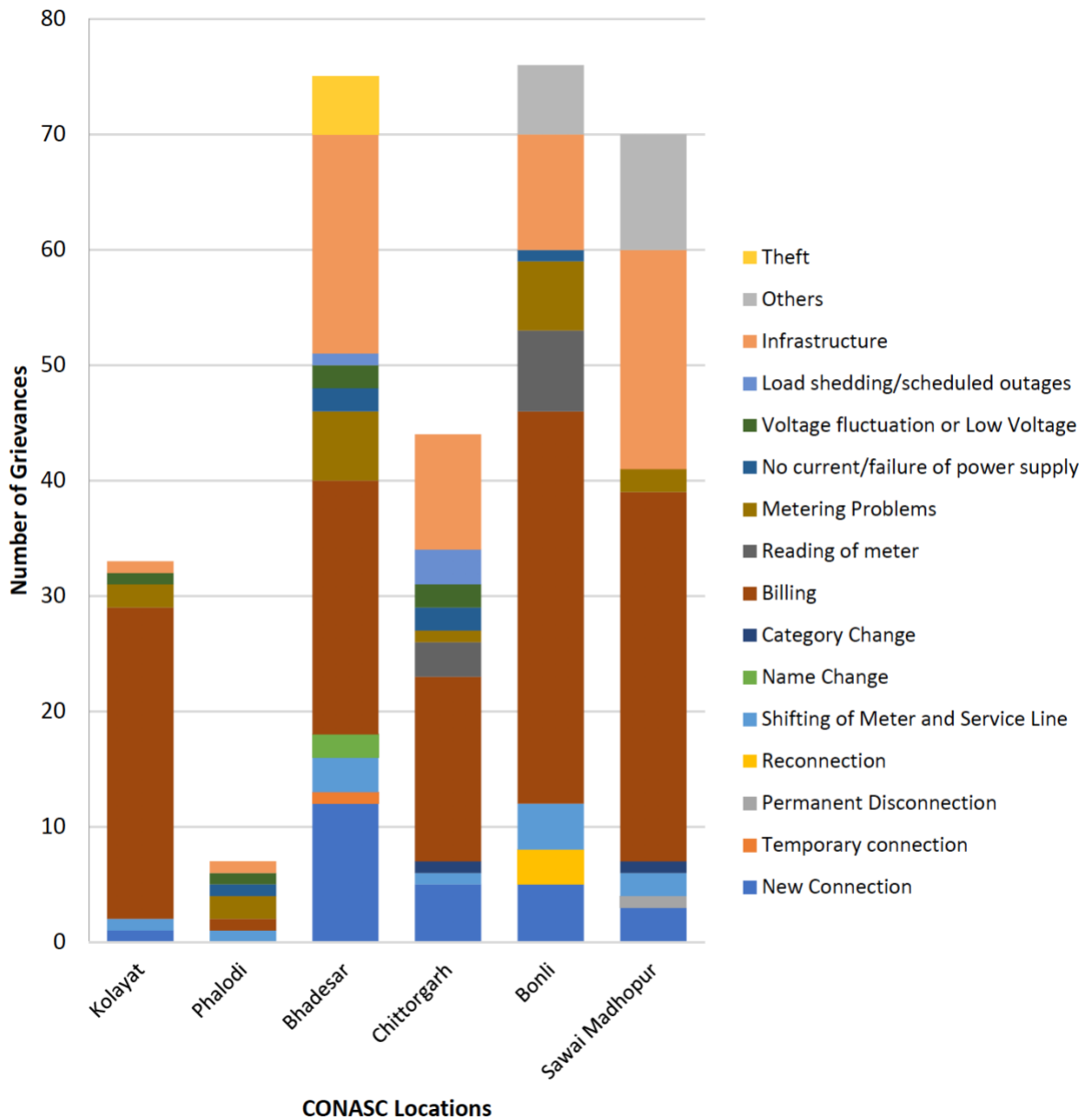


Figure 1: Consumer understanding of Electricity Bills

Data collected via our Consumer Support Centers across 6 blocks (refer Figure 2) indicates that billing and metering is the most common issue, followed by safety issues with infrastructure of distribution licensee. Former often leads to aggregation of dues, which further becomes a significant burden for low paying consumers.



Our experience during engagement with distribution licensee and grievance redressal forums has also been quite poor. Grievance Redressal Regulations in Rajasthan are inconsistent with most other States, and most forums below Corporate level being dysfunctional. Access to information on various subjects is also poor as the distribution licensee does not maintain independent websites.

These, along with other issues experienced by consumers imply that brand equity and trust level of distribution licensee amongst consumers is quite poor.

Key Recommendations

In light of the evidence regarding state of consumer experience on the ground (in context of Rajasthan) and principles of transparency, efficiency and accountability stated above, following key measures are suggested for consideration of Ministry of Power.

A. Awareness

Rights defined by the proposed Electricity Rules 2020 are likely to little significance unless consumers are made aware of such rights. Hence, it is suggested that mandate of consumer awareness shall be built into the proposed Electricity (Rights of Consumers) Rules, 2020. The responsibility to carry this mandate shall lie with distribution licensee, and regulatory commissions may define appropriate regulations towards this end. The commissions shall also be mandated to monitor the performance of distribution licensee on the mandate given here within. It is also suggested that distribution licensee shall be mandated to provide information regarding electricity tariffs, standards of performance, grievance redressal forums and consumer rights through appropriate notices issues along with electricity bills. Each subject of such nature shall be covered at least once in every 6 months, and emphasis shall be given for dissemination of information in vernacular languages.

B. Digitization and Integrated Platform for services, billing and grievances

Digitization of engagement with consumers offer many co-benefits for distribution licensee and consumers, and hence should be promoted on a mission mode. However, multitude of platforms is a cause of concern as it leads to low usability and adoption. Hence, it is suggested that distribution licensee shall offer single window dedicated accounts to electricity consumers through which most services offered by distribution licensee should be assessible. Such platforms shall not be limited to billing and payments or downloading forms, but also offer online request for new services, billing history, download as well as submission of documents, complaint registration with distribution licensee and internal grievance redressal forums, request for net metering, monitoring status of applications etc.

C. Tariff Rationalization and Simplification of Electricity Bills

Multiple of tariff slabs, along with various other charges and difficult to understand billing formats are a major cause of confusion amongst consumers. Further, too many consumer categories and tariff slabs lead to multiple inefficiencies such as higher administrative costs, poor allocation of subsidies and consumption inefficiencies when electricity tariff is not reflective of true costs. Hence, reduction of categories, simplification of electricity tariffs and user-friendly format of electricity bills are recommended. It is also suggested that a simple format of billing may be prescribed wherein only essential details are provided, while a detailed and described format can be prescribed to provide details to consumers on request through offline and online platforms.

D. Affordability

Access to affordable electricity is central to 'protection of consumer interests', as enshrined in the objective stated of the Electricity Act. To ensure access to affordable electricity, it is essential that inefficiencies of electric utilities (generation, transmission and distribution) and planning agencies should not be transferred to electricity consumers beyond an acceptable limit. This is already

being practices in case of distribution licensees wherein AT&C losses above 15% are not transferred to consumers. Similarly, inefficiency in planning resulting in low utilization of generation and transmission infrastructure should not be allowed to be transferred to the consumers.

E. Access to Information

As primary stakeholders, consumers play an important role in performance and sustainability of the power sector. Hence, access to all critical information, including performance of utilities, planning, decision making and rights etc should be made easily available to consumers through websites and offices of electric utilities.

Other comments pertaining to specific clauses of the Draft Electricity (Rights of Consumers) Rules) 2002 are as below.

4. Release of New Connection and Modification in Existing Connection

4(2)(d) In case hard copy of the application form is submitted, the same shall be digitized and uploaded on the website as soon as it is received and acknowledgement with the registration number for that applicant shall be generated and intimated to the applicant.

Our Comments: In case of submission of hard copy of the application form, the acknowledgement and registration number shall be generated and intimated to the applicant immediately.

4(2)(j) The Commission shall specify the maximum time period, not exceeding 7 days in metro cities, 15 days in other municipal areas and 30 days in rural areas, within which the Distribution Licenses shall provide new connection and modify an existing connection.

Our Comments: The provision of new connection or modification of an existing connections involves augmentation of existing of network depending on the area and quantum of the load requested. This could range from installation of additional poles/transformers and sometimes a substation. Hence this uniform maximum time period limit for all regions is operationally not feasible in all cases. It is submitted that different time frames are prescribed depending on the scope of work for providing new connection/modifying an existing connection. Below prescribed additional timeline may be prescribed over and above the proposed timelines for special cases.

Scenario / Case details	Additional Timeline
No requirement for poles, transformers or any other major equipment	None
Installation/extension of line up to five poles is required for the connection	7 Days
Augmentation of transformer required for the new connections	21 Days
New Transformer is required for the new connection	30 Days
New HT line is required for the new connection	45 Days

5. Metering

General comments:

It is the responsibility of the distribution licensee to ensure that the meter is in a good condition with all seals intact and meter screen easily readable. The distribution licensee shall keep a monthly record of the condition of the meter and the seals. Any signs of tampering or damage of the meter or seals or any other related issue shall be recorded by the meter reader and duly intimate the consumer of the same.

(1) No connection shall be given without a meter. The meter shall be the smart prepayment meter or prepayment meter. Any exception to the smart pre-payment meter or prepayment meter shall have to be duly approved by the Commission. The Commission, while doing so, shall record proper justification for allowing the deviation from installation of the smart pre-payment meter or prepayment meter.

Our Comments: The provisions/conditions for exceptions to installing the pre-payment meters should be defined and shall not be left to the discretion of the Commission. This exemption should only be provided on temporary basis, not exceeding a period of 06 months. Furthermore, deployment of smart meters is imperative to assess and monitor the energy usage of the consumers. However, given the existing infrastructure of discoms and awareness level and capacity of consumers, mandatory installation of pre-paid meters is not advisable. While the prepaid meter could be useful in managing energy usage and consequently energy bill, however, consumers are not well-capacitated to understand the nuances of energy planning and its usage. In addition, the discoms might not have the desired infrastructure to cater the demand of prepaid meters, should the draft Rules be implemented.

Thus, considering the capacity of the consumers to understand the mechanism of the prepaid meters and unavailability of required infrastructure, Bask and CUTS recommends that the given provision should be revised, and provision for mandatory deployment of prepaid meters should be removed. In addition, Bask and CUTS would also recommend that consumers must be given a choice in selection and installation of the type of meter most suitable to their requirements.

(6) If the meter is inaccessible to the meter reader on two consecutive meter reading dates, consumer shall have the option to send the picture of the meter indicating the meter reading and date of meter reading through registered mobile or through e-mail and in that case, distribution licensee shall not send any notice/provisional bill to the consumer.

Our Comments: While the option of self-billing is a welcome step, it shall be explicitly defined that the responsibility of the metering and billing rests with the distribution licensee. This is to ensure that the consumer is not harassed or inconvenienced because of the inefficiency of distribution licensee or meter readers.

In case when meter is inaccessible, its shall be the prerogative of the distribution licensee to connect with the consumer and collect meter reading remotely or through other appropriate mechanisms. Only in case of failure to comply with request of distribution licensee shall it generate a provisional bill. This shall reduce the billing irregularities and inefficiencies of the distribution licensee.

(7)(e) Testing of Meters - In case, during testing, the meter is found to be inaccurate, the excess or deficit charges shall be adjusted in the subsequent bill(s) as specified by the Commission.

Our Comments: In cases where the meter is found to be tested inaccurate and there is no valid evidence of tampering by the consumer, it is submitted to prescribe a period of at least 2 billing cycles for purpose of limitation for computation of the excess or deficit charges, which shall be applied retrospectively.

(8)(d) Replacement of Defective/Burnt/Stolen Meters - Distribution licensee shall replace the defective/burnt/stolen meter within a time period, not exceeding 24 hours in urban areas and 72 hours in rural areas or such shorter period as may be specified by the State Commission.

Our Comments: It is submitted to make provision for temporary by-passing of the meter in cases of burnt/stolen meters after inspection for immediate restoration of the supply. The consumer shall be charged for the consumption based on the average billing for the duration before the meter is replaced. The replacement of the meter shall be undertaken within 24 hrs.

In case the distribution licensee fails to replace the meter within the specified time period, a rebate of 5% for the immediate billing cycle, 10% for the second and 20% thereafter shall be provided to consumer until the meter is replaced. Such loss of revenue shall be separately recorded and reported by the distribution licensee to the regulatory commission. Such provisions shall ensure that DISCOM practices discipline in replacement of meters.

Additional clause: Issues pertaining to pre-paid meters

In case of pre-paid meters, issues related to recharging during operation are reported, resulting in disruption of the supply of the power. It is submitted to prescribe a timeline of 30 minutes for resolution of issue(s) in such cases. Renumeration under SoPs may be defined for same.

This shall ensure that distribution licensee invests in robust technology and consumers are not averse to pre-paid meters.

6. Billing and Payment

Billing practices vary across states. Issues such as difficulty in understanding bills, explanation of charges, poor print quality are common. Hence there is a need to establish minimum standards in billing practices. Further, it is also important that bill formats are made consumer friendly. This shall help in improving consumer trust and avoid majority of issues related to misunderstanding of electricity bills. Towards this end, it is suggested that a simplistic billing format is adopted with prescribed quality of printing to be issued to consumers as a default. Advertising on the electricity bills should not hamper readability or availability of space for necessary information. A format for detailed and descriptive billing may also be advised which shall be available to consumers on request via electronic mediums and consumer service kiosks such as e-Mitra. Hard copies of such bills may also be provided on request provided that dispatch charges are borne by consumer.

Comments related to specific clauses related to 'billing and payment' are submitted below.

(1) Tariff for each category of consumers shall be available on distribution licensee's website and consumers shall be notified of change in tariff including fuel surcharge and other charges, a full billing cycle ahead of time, through distribution licensee's website as well as through energy bills.

Our Comments: It is suggested that specific tariffs details (including various necessary details) pertaining to their respective category are shared with consumers through customized notices attached to the bill and through electronic mediums (including, consumer's email, distribution licensee's website and social media), a full billing cycle ahead of time.

(2) The distribution licensee shall prepare the bill for every billing cycle based on actual meter reading and the bill shall be delivered to the consumer by hand or post or courier or e-mail or any other electronic media at least 10 days prior to the due date of payment.

Our Comments: The time duration between the delivery of the bill and due date should be in concurrence with provisions for early payment incentives provided by distribution licensees wherever applicable. This shall encourage the consumer to clear the dues early and thus benefitting the distribution license in cash flow. Separate timeline for due from date of issuance of bill may be prescribed for rural and urban areas based on typical period required for delivery of electricity bills. It is recommended that special incentives may be provided for resorting to e-bills only in rural areas.

(3) In case of non-receipt of original bill, the consumer shall be entitled to get a duplicate copy of the bill and shall also have the option to deposit self-assessed bill as per the procedure approved by the Commission. Provided that the excess/deficit payment, in case of self-assessment, shall be adjusted in the next bill(s).

Our Comments: Distribution licensee shall provide a telephonic and an app enabled self-assessment mechanism to ensure authenticity and ease of self-assessment.

(4) In case of pre-payment metering, the distribution licensee shall issue bill, to the consumer, on his or her request.

Our Comments: It is suggested that quarterly or half yearly bills are issued to all pre-paid consumers, with an option to issue bills on request.

(9)The distribution licensee shall not generate more than two provisional bills for a consumer during one financial year and if the provisional billing continues for more than two billing cycles except under extraordinary situation due to force majeure, the consumer may refuse to pay the dues until bill is raised by the distribution licensee as per actual meter reading.

Our Submission: There shall be no late payment surcharge in the cases when provisional billing continues for more than two billing cycles and consumer refuses to pay the dues provisional. Provisions to address the mechanism for the recovery of the dues shall also be made in the form of restructuring the dues in the form of monthly installments with no additional cost or interest for a period equivalent to the period over which charges have accrued. It is also proposed for a rebate of 2% for a delay of 30 days and an additional rebate of 2% per month on overall bill for the delay

beyond 30 days. This shall improve the focus on metering and billing which is a major cause for poor collection efficiency and disconnection.

(10) The information regarding the authority with whom grievance/complaint pertaining to bill can be lodged shall be provided along with the bill and the same shall also be available on distribution licensees' website.

Our Submission: It is submitted that information regarding the details/provisions for complaint registration and grievance redressal including the details of forums and ombudsman shall be shared via a separate notice along with the bill as a part of consumer awareness at least once in every 6 months. Same shall also be disseminated via email and other electronic mediums.

(12)(b) Payment of Bills: Bill amount of more than Rs. 1,000 or an amount specified by the Commission shall mandatorily be paid online. Commission shall specify a suitable incentive/ rebate for payment through online system.

Our Submission:

Since online payments offer more convenience to consumers and have already become mainstream, there is no need to offer incentive for same, especially in urban areas. Moreover, providing incentive for mandated action becomes redundant. However, suitable incentive may be provided for online payments in rural areas for a limited time as decided by the state commission. The limit for cash payment of bills shall be capped at INR 3,000 per month for electricity consumers. Higher limit may be prescribed for agriculture consumers or in cases wherein charges have accrued for any reason. Such limits may be reduced over a 3-5 years period as deemed appropriate by regulatory commissions and based on recommendation of concerned distribution licensee. This shall ensure smooth transition and avoid inconvenience, especially in areas wherein digital and financial literacy is poor.

7. Disconnection and Reconnection

(2) In case the disconnection has been done on account of non-payment of past dues, the licensee shall reconnect the consumer's installation within six hours of receipt of past dues and other charges as applicable.

Our Comments: Considering the operational challenges involved for the distribution licensee, the minimum time period for reconnection shall be made 24 hours after the receipt of past dues and other charges as applicable. At the time of disconnection, if consumer agrees to settle the dues on the spot, either in cash or through online payments, disconnection shall be avoided if all dues (including penalties) are recovered.

8. Reliability of supply

(1) The distribution licensee shall supply 24x7 power to all consumers. However, the Commission may specify lower hours of supply for some categories of consumers like agriculture.

Our Comments: The aim to supply 24x7 power to all consumer is a transitional process which can only be achieved through incremental improvements in a phased manner. In the current scenario of low energy deficit and under-utilization of generation capacity, the latter is no longer a

limitation for achieving 27x7 supply of electricity. Major barriers towards 24x7 electricity supply are bottle necks in distribution infrastructure and high feeder level AT&C losses. Hence, it is suggested that SERCs shall mandate the distribution licensee to devise a 5-year plan to achieve 24x7 supply for all consumers (excluding agriculture). This shall begin with mapping all feeders and existing quality of supply and segregating them into different tiers as below. Supply quality below Tier IV shall not be allowed. distribution licensee shall present a plan to achieve Tier I supply quality across all feeder in a period of 5 years or as dictated by regulatory commission, and same shall be monitored on quarterly basis.

Tier I: 24 hrs supply on consistent basis

Tier II: Minimum 22 hrs of supply on average basis (computed monthly)

Tier III: Minimum 20 hrs of supply on average basis (computed monthly)

Tier IV: Minimum 8 hrs of supply on average basis (computed monthly)

For any feeder to qualify for respective Tier, the corresponding mandate of supply quality shall be maintained for a continuous period of 3 months. Post that if supply quality is not maintained for 2 consecutive months, the particular feeder shall be demoted accordingly.

(2) The Commission shall specify the following parameters to maintain the reliability of supply by the distribution licensee:

(i) Total duration and frequency of outages per consumer in a year -

a. System average interruption duration index (SAIDI)

b. System average interruption frequency index (SAIFI);

(ii) the minimum outage time (in minutes) that the Distribution Licensee shall consider for the calculation of SAIDI/SAIFI

Our Comments: The standard methodology for calculation of SAIDI and SAIFI along with the allowed minimum outage duration shall be specified under the rules and shall not be left to interpretation of commission. These parameters shall made available on monthly and annual basis for both the overall geographical area of the distribution licensee and for each zone/district correspondingly for rural and urban feeders.

Further, it is observed that significant variance in supply quality exists across distribution area, especially between urban and rural areas. Hence, it is suggested that these parameters are monitored at district level, and reporting is done for urban and rural feeders collectively. Considering practical viability on the ground, the commission may define separate benchmarks for rural and urban feeders for assessment of standards of performance.

9. Consumer as Prosumer

(1) While the prosumers will maintain consumer status and have the same rights as the general consumer, they will also have right to set up Renewable Energy (RE) generation unit including roof top solar PV systems — either by himself or through a service provider.

Our Comments: Along with roof top Solar PV systems, biogas, wind, energy storage and other appropriate technologies should also be considered. This shall facilitate better adoption of renewable energy and provide a technology neutral approach.

(5) The distribution licensee shall facilitate the process for setting up of RE generation system at prosumers' premises. In this regard, the licensee shall:

Our Comments: The information related to the available capacity of the transformer for the installation of Grid connected Solar PV Rooftop applications should be made available online, along with capacity for which applications are in process. Applications shall be cleared on first come, first serve basis. This shall efficient and transparent approval of application and improve consumer experience.

(12) In case of any delay on the part of distribution licensee without any just cause, the Licensee shall be liable to pay compensation to the consumer at a rate which shall not be less than Rs 500 per day for each day of default.

Our Comments: The compensation should be based on the deemed generation instead of the default flat rate proposed to fairly compensate consumer for the inefficiency or shortcoming of the distribution licensee.

10. Standards of Performance

(1) The Commission shall notify the Standards of Performance for the distribution licensees as per sub section (1) of Section 57 of the Act and in consonance with the Rules.

Our Comments: The distribution licensee shall publish/display the notified rules along with the standards of performance along with details of the compensation on their websites and offices in bilingual (English and local/vernacular). Same shall also be shared with consumers at least once in 6 months as special notices along with bills and also disseminated through electronic mediums.

(3) Compensation Mechanism

Our Comments: The meters installed shall mandatorily have provision to record the voltage profile. This helps capture the issues related to the voltage fluctuations which are otherwise difficult to record to raise the complaint/claim the compensation. The rules shall prescribe the minimum standards for the compensation for issues notified in the rules 10(3)(d).

f) In all cases of compensation, the payment of compensation shall be made by adjustment against current and/or future bill (s) for supply of electricity, within stipulated time from the determination of claim as prescribed by the Commission.

Our Comments: The stipulated time for the payment of compensation through adjustment against the bill shall not exceed 2 billing cycles from the date of determination of the claim.

12. Grievance Redressal Mechanism

Efficient and non-partisan resolution of grievances is central to holistic consumer experience and enforcement of their rights. Our experience suggests that officials of distribution licensee at sub-

district levels are averse to address consumer grievances through Forum, and often discourage consumers from registering their consumers. Further, often no response is received for grievances filed via post, indicating dysfunctional state of the Grievance Redressal Forums.

To improve experience of consumers and their trust in Grievance Redressal Forums, following suggestions are made.

(1) The distribution licensee shall create Consumer Grievance Redressal Forum (CGRF). under sub section (5) of section 42 of the Act at different levels i.e., subdivision, division, circle, zone, company level etc. The Forum shall be headed by an officer of the licensee of appropriate seniority and have two to three members as consumer/ prosumer representatives from other than the employees of the distribution licensee. The forum may be assigned different types of grievances depending on the nature of the grievance and the level at which it can be best resolved.

Our Submission:

- (1) There shall be at least one-member representation from the civil society or person of social repute (who are not former employees of distribution licensee) in the forum who shall be appointed for a period not less than 03 years. The power to remove the member shall rest with the managing Director (MD) of the distribution licensee who is mandated to provide valid justification along with evidence to initiate the removal proceedings against any appointed member. Regulatory commissions shall prescribe framework for nomination, selection, appointment and remuneration of such members.
- (2) Each forum shall be scheduled at least once in every 15 days for a minimum time duration of 3 hours. Schedule for convening of forums shall be made available on distribution licensee's website.
- (3) Consumers shall be allowed to register complaints at appropriate forum through email, website, consumer apps, in person, via post and other suitable mediums.
- (4) Distribution Licensee shall empanel an independent civil society organization at block level to provide advisory support to consumers. Suitable training and remuneration may be provided to such civil society organizations.

13. General Provisions

(1) The distribution licensee shall provide access to various services such as application submission, monitoring status of application, payment of bills etc. to consumers through its website/web portal, Mobile App and its various designated offices area-wise.

Our Comments: The distribution licensee shall provide an integrated platform with individual online account for each consumer with bilingual access available both on the website and app. This is to increase the access of the consumer to the services and reduce the mandatory visit to the offices. The features of the platform shall include but not limited to,

- (a) View/manage connection – Information related to consumption history, billing history, payment history, service history (including requests and complaints raised) for the preceding 24 months duration.
- (b) Request Service – To raise a service request related to change in connection name, change of connection category, change in sanctioned load, shifting of meters and self-billing.

- (c) Manage service - To facilitate online submission of necessary documents, payment of necessary fee for the services.
- (d) Register complaint with grievance redressal forums

14. Rights Related of issues of theft and unauthorized use of electricity.

Harassment of consumers at hands of vigilance committee is often reported. To avoid such instances, following suggestions are recommended:

- (1) Inspection shall be carried out in presence of consumer or his/her representative who is of legal age.
- (2) In case evidence for unauthorized use of electricity under Section 126 of the Electricity Act or dishonest practice under Section 135 of the Electricity Act is found, the consumer shall be served a notice explaining his offence and penalty.
- (3) Consumer shall also be provided with information in writing or through digital medium regarding his rights and mechanisms for appeal in case he/she wishes to file the same.
- (4) On request of the consumer, he/she shall be provided details of empaneled consumer advisor for purpose of guidance and provision of information.

15. Accidents, Damage and Loss of Life

It is suggested that the rights of consumers in cases of damage of equipment, loss of life/permanent disability of human or livestock and damages to property arising out of electrical accidents from broken/faulty electrical lines, poles, stay wires or any installation in the jurisdiction of the distribution licensee shall also be defined under these rules. Following clauses are suggested for same.

- (1) Provisions under this section shall not be limited to the consumers, but shall also be applicable to any person aggrieved by an accident caused by any installation of the distribution licensee, provided that such harm is not caused by the neglect, unauthorized or illegal action on part of the victim.
- (2) The inspection shall be done by the representative of the distribution licensee (not below the rank of Assistant engineer) within 24 hrs and shall prepare and submit a copy of the preliminary report to the complainant within 2 days from the time of intimation of the accident.
- (3) The final report of the accident shall be made available to the complainant or his/her authorized kin in case of deceased within 7 days from the time of intimation of the accident.
- (4) The commission shall formulate the rules for determination of the compensation to be paid within 3 months from the date of publication of these rules which shall be annually adjusted to rate of the inflation. This shall be reviewed by the commission every 05 years.

ANNEXURE I

List of Organizations and Individuals supporting the recommendations and comments submitted here.

S.No.	Name of Signatory	Name of Organization	District
1.	Simran Grover	Bask Research Foundation	Jaipur
2.	Udai Mehta	CUTS International	Jaipur
3.	Rakesh Parmar	Samajiv Vikas Samiti	Dholpur
4.	Hari Prasad Yogi	Consumer Legal Help Society	Sawai Madhopur
5.	Madan Giri Goswami	CUTS Center for Human Development	Chittorgarh
6.	Liyakat Ali		Jodhpur
7.	Anshul Ojha	Desert Resource Center	Bikaner
8.	Manish Mehta	Independent Consumer Advocate	Bundi
9.	Sarfraz Sheikh	Kotda Adivasi Sansthan	Udaipur
10.	Raghvendra Singh	Ajmer Zila Gramin Upbhokta Sansthan	Ajmer