

KERALA STATE ELECTRICITY REGULATORY COMMISSION

THIRUVANANTHAPURAM

PRESENT: Shri. C. Balakrishnan, Chairman
Shri. C. Abdulla Member
Shri. M.P.Aiyappan, Member

January 15, 2009

Petition DP No.71 of 2008

In the matter of

Complaint regarding insufficiency of the Electricity power allotted for new LT industries as
50 units/kW

Shri. Shaji Sebastain, Vice President, The Kerala State Small Industries Association, Ernakulam district	Petitioner
Vs	
Kerala State Electricity Board, Vydhyuthi Bhavanam, Thiruvananthapuram -4	Respondents

Petition DP No. 72 of 2008

In the matter of

Review petition under Regulation 67 of KSERC (Conduct of Business) Regulations, 2003

M/s Premier Marine Enterprises, Eramalloor, Alappuzha	Petitioner
Vs	
1. Kerala State Electricity Board, Vydhyuthi Bhavanam, Thiruvananthapuram -4	Respondents
2. The Executive Engineer, KSEB, Cherthala.	
3. The Asst. Engineer, KSEB, Electrical Section, Aroor.	

Petition DP No. 73 of 2008

In the matter of

Review petition under Regulation 67 of KSERC (Conduct of Business) Regulations, 2003

M/s Alen and Joy Ice Plant, Aluva, Ernakulam	Petitioner
Vs	
1. The Chief Engineer, Commercial Kerala State Electricity Board, Vydhyuthi Bhavanam, Thiruvananthapuram -4	Respondents
2. The Kerala State Electricity Board, Pattom, Thiruvananthapuram	

ORDER

Background

1. M/s Kerala State Small Industries Association, Ernakulam district represented by its Vice President, Shri. Shaji Sebastain filed a petition against the circular issued by KSEB dated 10-10-2008 stating that in the said circular, the power supply to new units was restricted to 50 units per kW which was quite insufficient. According to the petitioner the circular is arbitrary, and against natural justice. The Commission accepted the petition as DP No.70 of 2008 and issued notice to the petitioner and respondent KSEB. The Commission also received several representations from consumers regarding fixation of quota for LT consumers. Hence, the Commission decided to hear the matter in detail by affording an opportunity to those who represented before it and scheduled the public hearing in two places: at Thiruvananthapuram on 1-1-2009 and at Kozhikode on 5-1-2009 and issued notices accordingly. The Commission also informed the Licensees on the conduct of public hearings so that licensees and consumers under their area of supply can also participate in the proceedings.
2. In the mean time, M/s Premier Marine Enterprises and M/s Allen and Joy Ice Plant approached the Hon. High Court of Kerala on the issue of fixation of quota for them. The Hon. High Court vide its order dated 15-12-2008 directed the petitioners to approach the Commission by invoking the power under Regulation 67 of KSERC(Conduct of Business) Regulations, 2003.
3. As per the direction of the Hon. High Court, M/s Allen & Joy and M/s Premier Marine Enterprises filed petition before the Commission as per Conduct of Business Regulations. The Commission accepted the petitions and issued notices to them for attending the public hearing already scheduled on 1st & 5th of January, 2009. The Commission also issued press release to inform the public about the hearings so that any aggrieved consumer can participate in the proceedings.
4. Shri. T.T Mammed Koya and others filed a petition for fixation of quota for newly started Ice Plants based on the direction from the Hon. High Court of Kerala dated 15-12-2008. However the petition was defective on account of non-payment of petition fee. The fee was paid on 6-1-2009, i.e., after the second public hearing.

Therefore the same could not be treated as a petition. Since similar questions were raised in the said defective petition, the Commission considers the same as a representation and treated accordingly.

Public Hearings on the Petition

5. In the public hearing held on 1-1-2009 at Thiruvananthapuram, Shri. Shaji Sebastain, representing the Kerala State Small Industries Association, argued that, small scale industries are the major employment providers and contribute to the base load of the KSEB system, thereby improving the load factor. The circular issued by the Board limiting the power supply to 50 units/kW for new units is against the principle of natural justice. In many cases, even for the existing industries the quota fixed was below 50 units/kW mainly due to low level of activity during 2007-08. According to him, for the process industries, quota should be fixed based on 80% load factor, ie., 576 units/kW. In the case of single shift industries, it should be about 288 units/kW. These norms are to be applied to new industries also. Fixing lower norms for new industries is a clear cut discrimination. In the case of HT units, the Board has fixed a norm of 250 units/kVA of maximum demand. This higher provision for HT units naturally increases their competitiveness compared to small units. The original proposal of KSEB for limiting power consumption, does not contain 50 units norm for new units. Hence the decision lacks transparency. Further as all the industries are paying fixed charges to KSEB, they are to be provided electricity supply without interruption. The terms and conditions of tariff does not provide for charging actual cost of power for the units consumed above the quota. It was also brought before the Commission that, the allotment for minimum guarantee consumers are also less. He argued that the quota may be fixed as 250 units/kW for new units and the same norm to be applied to additional load with retrospective effect.
6. M/s Allen & Joy ice plant, represented by its Adv. Abdul Karim, stated in their petition that the electricity supply was provided for the unit on 29-7-2008. While arriving at the decision on fixing 50 units as quota, the petitioner was not heard and is aggrieved by the method of quota fixed. Earlier when power cut was introduced in 1996, the Government had allowed the use of 500 units/kW of connected load per month for ice plants. Further as a new unit, the petitioner is at a disadvantageous position compared with old units and have to pay very high rates as electricity

charges. The petitioner has approached the Commission as directed by the Hon. High Court. According to him, the petitioner should not have been treated as new unit and the quota that allowed was just sufficient for 3 days of operation. Therefore he sought modification of the order.

7. M/s Premier Marines was represented by Adv.Ziyad Rahman. The petition was filed as per the directions of the Hon. High Court. The petitioner is operating an ice plant with total connected load of 74 kW. The power supply was effected from 1-8-2008. The monthly consumption as per the invoices was 37400, 40560 and 39507 units. The quota fixed was only 3700 units and consumption above the quota is charged at higher rates. The petitioner is aggrieved by the method of quota fixation since KSEB in their petition recommended restriction of 25% of their normal consumption based on past one year average. The objections of petitioner was not sought for fixation of quota. The stand taken by the Commission is against the method of fixing quota practiced during previous power cut period. In 1996, government had fixed the quota as 500 units/kW. Further, the petitioner has paid security deposits to KSEB which is equivalent to 2 months consumption which is much higher than what Commission has estimated. The Board had no intention of fixing such unreasonable quota. In their petition, Board did not plead for fixing of quota and as per the Conduct of Business Regulations of the Commission only what is pleaded is to be allowed. The Commission has taken a load factor of 15% for arriving at the quota, which is highly discriminatory.
8. In addition to the petitioners, many consumers also participated in the public hearings. List of persons attended the public hearing is annexed to this order. In general, consumers have raised the issue of fixation of quota as inadequate especially for new consumers and they also pointed out that quota for additional load taken during the current financial year was not included in the Order of the Commission. Some consumers argued that KSEB has taken 50 units per kW as base average for new consumers and quota fixed is 40 units/kW. A few of the consumers pointed out that the consumption during previous year was lower owing to many reasons and hence the quota fixed based on the previous year was much lower compared to similarly placed units. Most of the consumers demanded that the quota shall be fixed in the same way as for HT consumers, which is 250 units /kVA of maximum demand.

9. In their reply Board addressed the issues raised by the petitioners. Board has contended that the review petition is to be dealt under order 47 rule 1 OF Code of Civil Procedure which has been maintained by the Commission in the previous occasions. The Board also objected the contention of the petitioners that the decision was taken without public hearing. The public hearing was conducted on 29-9-2008 and after following the procedures under the Electricity Act 2003 and KSERC (Conduct of Business) Regulations the order was issued. The Board also objected to the demand for retrospective revision of quota stating the reason that it will create heavy impact on the financial position of the Board which will further aggravate the present power crisis. Board has conducted a sample study on a few consumers in Thiruvananthapuram for the period from January 2008 to June 2008 (before the restrictions) which indicates that the average consumption pattern with respect to connected load is as follows:

Type of industry	Connected load (KW)	Average monthly consumption/kW
Flour Mill	10.10	11.51.10
Filatex (a continuous process industry)	12.76	13.86.58
Power laundry	14.13	15.227.00
Clay dryer unit	16.39	17.58.00
Aluminum extrusion	18.93	19.42.00

10. The claim of the petitioner that the quota fixed is to be based on connected load, the total energy requirement would be about 70000 MU which is much larger than the actual energy requirement which is below 17000 MU. According to the Board, assuming 35% load factor with 25 working days in single shift, the average requirement would be only 70 units and the quota shall be 56 units. The total consumption of LT industries is about 984 MU and the connected load is 1290 MW. If 250 units /kW norm is to be adopted, the consumption would works out to 3900 MU against the actual 984 MU. When based on actual connected load and consumption, it works out to 50 units only and hence the decision of the Commission is justifiable and is to be sustained. Board on receipt of similar requests have already made reasonable corrective measures to rectify the difficulties encountered due to quota fixation.

11. Regarding the petition of the M/s Alen & Joy Ice Plant and M/s Premier Marine enterprises, the Board has contended that even with power crises, a new

connection was given to the petitioner which shows the consumer focused approach of the Board, which aggravated the crisis and Board is ultimately compelled to appeal before the Commission for remedial measures. The contention of the petitioner that they were not a party to the proceedings was to conveniently hide the realities as the Hon. Commission had held the public hearing after giving wide publicity through media and consumers representing the different segments have attended the hearings. Failure on the part of the petitioner to participate in the proceedings would not insulate them from the directives of the Commission. Regarding the Government Order fixing the quota as 500 units, Board stated that the situation was much different from that existed at the time of the said order. At present there is shortage of cheaper power and the Commission has introduced only restrictions. Consumers who can afford to pay higher cost have the option to draw power at a cost equal to the high cost of energy purchased by KSEB. In the light of severe energy crisis, KSEB pleaded that quota for industries that came into operation from 1-4-2008 and operating only one shift of 8 hours be maintained at a level of 50 units as approved vide order dated 6-10-2008. In the case of special nature of consumers, the Commission may fix higher quota and any revision of quota shall be allowed to be implemented only prospectively considering the huge financial implication.

Analysis of the Commission

12. The Commission considered the arguments made by the petitioners and the Board and other consumers who participated in the public hearings and the written submissions made by them. KSEB challenged the sustainability of review petition filed by M/s Premier Marine enterprises and M/s Alen and Joy Ice in the light of orders of the Commission on review petitions on TP No. 20 and TP No. 22 of 2006 filed by KSEB, which elaborates the legal limitations under Order 47 Rule 1 of Code of Civil Procedure. On this ground, elaboration of the circumstance leading to this order needs to be explained. M/s Kerala State Small Industries Association filed the petition before the Commission against the Circular No. KSEB/TRAC/LT restriction 2008 dated 10/10/2008 on fixation of quota for new consumers. The Commission accepted the petition as DP 71 of 2008. The Commission has also received representations from several consumers on the fixation of quota especially for additional load taken during the current financial year. Hence Commission decided to schedule public hearings to cover a larger audience at two places at

Thiruvananthapuram and Kozhikode on 1-1-2009 and 5-1-2009 respectively. In the mean time, Hon. High Court of Kerala in its Judgment dated 15-12-2008 disposing the petitions WP(C) Nos 33887/08 H, 34698/08 E and 32720/08 G, relegated the matter to the Commission by invoking power under Regulation 67 of Conduct of Business Regulations and directed the petitioners to approach the Commission within a period of one week from the date of the order. The Court further directed the petitioners and the Board to represent before the Commission on 1-1-2009. The Court also ordered further that the Commission shall proceed to consider the applications, hear the parties and take a decision on the same in accordance with the law at the earliest and at any rate within two weeks from 1-1-2009. Based on the directions from the Hon. High Court, the Commission decided to hear the petitioners along with the DP 71 of 2008.

13. The Commission based on the petition from KSEB had introduced power restrictions to HT and EHT consumers to the tune of 25% initially. The Commission was of the view that while imposing restrictions discrimination shall not be made among the consumers as the shortage situation existing in the State is to be shared by all consumers. Further, as per Section 23 of the Electricity Act, 2003, if the appropriate Commission is of the opinion that it is necessary or expedient so to do for maintaining efficient supply, securing equitable distribution of electricity and promoting competition, it may by order, provide for regulating supply, distribution, consumption or use thereof. Hence, the Act empowers the Commission to issue directions to the licensee for securing equitable distribution of electricity by regulating the supply, distribution and consumption or use of electricity. Accordingly, the Commission directed KSEB to file proposals for introducing power restrictions to LT consumers also. Based on the petition of KSEB and after analyzing the power situation existing in the State, the Commission has extended the power restrictions to LT consumers also and uniformly applied the restrictions at a rate of 20% to all consumers. For operationalising the 20% restrictions, base year was fixed as 2007-08. However, for new consumers in the absence of history of consumption during 2007-08, the Commission decided to adopt a norm of 50 units/kW of connected load. In the absence of such a norm, introduction of power restrictions to such consumers would be difficult which amounts to discrimination. While arriving at the decision the Commission has considered several factors including the earlier norm fixed by the Board vide its order dated 30-7-1996.

14. In the Original petition for introduction of power restrictions for HT and EHT consumers to the tune of 25% the Board did not request for fixing the norm for any consumers. Considering the comparatively low number of consumers in the HT-EHT category, in the Order dated 24-7-2008 the Commission directed the Board to furnish modalities for fixing quota for consumers who do not have adequate consumption during 2007-08 for approval. Accordingly the Commission had approved the proposal of the Board for fixing the base average consumption and norm for those who do not have adequate consumption during 2007-08. However, in the case of LT consumers, the Commission has decided the quota considering the large size of consumers and to have uniformity in the application of restrictions. Hence the contention of the petitioner that Board has not requested for fixing the quota for new consumers is not sustainable and cannot be accepted, as even in the absence of request of the petitioner Board, the Commission is duty bound to provide for the norm as fixation of quota is an inseparable matter for introduction of power restrictions. Accordingly the contention of the petitioner is unsustainable.
15. In the absence of history of consumption for the new units, for introduction of power restrictions, fixation of quota is the only feasible option. In the LT categories, the consumer mix and consumption pattern is highly divergent. It would be practically impossible to decide quota for different category of consumers separately considering the varied usage pattern. The only option would be to have reasonable assumption on the pattern of consumption for arriving at the quota. Even if, for argument's sake the actual consumption during 2008-09 is to be considered for the new consumers connected on or after 1-4-2008, there would be wide variations in the consumption among the consumers as new units may not have achieved full-fledged consumption during the preceding months. Some units may not have even one month consumption and fixation of quota would be insufficient for many consumers. Thus considering the practical difficulties in considering the past consumption for new consumers, the only alternative left for the Commission is to decide norm/quota based on reasonable assumptions.
16. It is also to be noted, as contented by the Board, while introducing the restrictions, the consumption of cheap power is restricted considering the availability of cheaper power. The consumers can use energy over and above the quota, provided they pay the actual cost of power. Hence the power restrictions imposed now and by the erstwhile Board in 1996 are different.

17. The petitioners contented that no opportunity was given to them while deciding the matter is also highly unfounded as rightly objected by the Board. The Commission has given sufficient opportunity to the consumers to represent before the Commission on the matters relating to power shortage (such as fuel surcharge and power restrictions), several hearings were conducted on fixing and reviewing the power restrictions. The details of such proceedings conducted by the Commission are given below:

Date	Place	Matter
23-7-2008	Commission's Office, Thiruvananthapuram	OP No.3/2008, on introduction of restriction to HT-EHT consumers
2-8-2008	Institution of Engineer's Hall, Thiruvananthapuram	TP 54 of 2008 on introduction of thermal surcharge
4-8-2008	YMCA Hall, Ernakulam	TP 54 of 2008 on introduction of thermal surcharge
1-9-2008	Institution of Engineer's Hall, Thiruvananthapuram	OPNo.3 of 2008 Review of Power restrictions
29-9-2008	Institution of Engineer's Hall, Thiruvananthapuram	OP No.4 of 2008 Restriction of power supply to LT consumers
1-11-2008	Institution of Engineer's Hall, Thiruvananthapuram	OP NO. 3 of 2008 and TP No. 54 of 2008, Review of Power restrictions and surcharge
4-11-2008	NMR Hall, Palakkad	OP NO. 3 of 2008 and TP No. 54 of 2008, Review of Power restrictions and surcharge
5-11-2008	Chamber of Commerce Hall, Thrissur	OP NO. 7 of 2008 Restriction of power supply to licensees other than KSEB

18. In addition to the above, the Commission also convened the meeting of State Advisory Committee to deliberate on the issue. In none of the above proceedings contentions raised by the petitioner now have been raised. The petitioner in their wisdom decided to abstain from the above proceedings, which cannot be treated as a ground but only as an excuse. Hence the contention made by the petitioners is legally unsustainable and cannot be accepted.

19. Petitioners have argued that in the case of HT/EHT consumers a norm of 250 units/contract demand/kVA was used and pleaded to use the same norm for LT consumer

also. It is to be noted that the *contracted demand in kVA* and *connected load in KW* are different. In many cases the contracted demand in kVA would be less than 50% of the connected load. Further billing is based on the simultaneous maximum demand recorded by the HT/EHT consumer based on the demand meter reading and the rates for billing demand is also high compared to LT consumers who are billed based on connected load. Hence the contention of the petitioners that norm for the HT/EHT consumers to be applied to LT consumers cannot be accepted.

20. The petitioners also brought to the attention of the Commission the Government Order fixing the quota for Ice Plants as 500 units/kW. In the proceedings before the Commission, the said order cannot be dealt in isolation and cannot be taken as a precedent for determination of quota. As contented by the Board, the power situation existing at present and that existed in 1996 was entirely different. Further the laws relating to Electricity sector itself have changed drastically and so also the role of the Government. The Commission had forwarded the petition of KSEB on the introduction of power restriction to the Government for comments. The Government had endorsed the views of the Board.

21. While deciding the quota for new LT consumers, the Commission has considered the usage pattern of all categories of consumers such as domestic, commercial, non-domestic and non-commercial consumers, taken together. Since major share of consumers belongs to Domestic and commercial category, constituting about 93% of total consumers, their usage is during 6 PM to 10 PM. Assuming use of 50% of connected load per day for 25 days, the Commission arrived at a norm of 50 units/kW. The Commission has already decided the quota for domestic consumers as 200 unit/month, which constitute about 79% of the total consumers. Hence the quota for other category of consumers, such as LT commercial, LT Industrial and other LT consumers are to be considered separately. As per the ARR filed by the Board for 2007-08 and 2008-09, the estimate of average consumption per KW of connected load works out as below.

	kWh/kW connected load		
	LT Commercial/ Non-Commercial	LT Industrial	Average
2007-08	80.03	63.11	71.57
2008-09	89.70	69.00	79.35

22. The Board has stated that the average consumption of different category of consumers varied from 42 units to 277 units/kW based on the sample study. The Board has estimated that assuming 35% load factor for an industry working for 8 hours, the consumption would be about 70 units/kW and accordingly 80% of that would be about 56 units/kW as the quota. Though the sample study conducted by the Board may not represent all consumers, the same can be used as an indicator, in the absence of any other information available before the Commission. However the suggestion of the Board that quota to be fixed considering the single shift and special nature of the industries is difficult to accept as the connection is generally not given based on the duration in which a consumer uses electricity. Further, it would be difficult and practically impossible to monitor the consumption pattern or period of operation for such large number of LT consumers. Hence the Commission is of the view that consumers cannot be segregated based on the nature of operation for fixation of quota. However, the Commission is inclined to accept the contention of the Board that changes in the quota shall not be allowed retrospectively considering the adverse financial implications and difficulty in readjusting the bills retrospectively.

23. Considering all the above, the Commission is of the view that on an average basis taking all consumers (except domestic) together, about 50% of the connected load would be used on an average basis and assuming load factor as 35% and 25 working days in a month, the consumption would be about 105 units/kW. Hence 105 units can be considered as base average consumption for new consumers. Accordingly, quota shall be 80% of the average consumption which is about 84 units/kW/month.

Order of the Commission

24. The Commission after considering the above analysis, the arguments made by the petitioners, other consumers & the Board, with due consideration of the fact that there is non-availability of sufficient power in Kerala at present, and provisions under the Act such as equitable distribution of power among consumers hereby orders as follows:

- Base average consumption for the new LT consumers other than domestic consumers for whom power restrictions shall be applicable would be refixed

as 105 units/kW of connected load. By imposing restriction of 20%, the quota for such consumers shall be fixed as 84 units/kW/month.

- In the case of consumers who have taken additional load on or after 1-4-2008, the base average of 105 units/kW shall be applicable for the portion of the additional load and quota shall be fixed accordingly.
- Existing consumers (prior to 1-4-2008) who did not have adequate consumption or nil consumption in any period during 2007-08, the base average shall be worked out similar to the method followed for HT-EHT consumers. However, if such average is below 105 units/kW, the norm of 105 units/kW shall be applied and quota fixed accordingly.

This shall be effective from 1-2-2009.

Sd/-
M.P. Aiyappan
Member

Sd/-
C. Abdulla
Member

Sd/-
C. Balakrishnan
Chairman

Authenticated copy for issue

Secretary in charge

**LIST OF PERSONS ATTENDED THE PUBLIC HEARING ON PETITION NO. DP 71/2008,
DP 72/2008 AND DP 73/2008**

INSTITUTION OF ENGINEERS HALL, THIRUVANANTHAPURAM (01.01.09)

1. Sri.Shaji Sebastian, KSSIA, V.P., Ernakulam
2. Sri. T.H.Badarudeen, Syda Poly Laminates
3. Sri.Yado Nambiar, Poly rope Industries
4. Sri.K.V.Thomas, Winnie Wires & Wire Products
5. Sri.P.I.Joy, Pynadath Industries
6. Sri.Anil Krishna, MD, KINFRA
7. Sri, Meethiyen, National Plastics
8. Sri.Sathyan, Partner, Jayalakshmi Marketing
9. Sri.Mohammed Sirajidin, Partner, Quality Eva Products
10. Sri.Mathew Joseph, EVM Rubmix Co. Ltd, Erumathala
11. Sri.Lalsingh, Manager, Mathewsons Industries India Ltd
12. Sri.Saju Varghese, BOS National Flours (P) Ltd
13. Sri.T.G.Jayaraj, Shine Plastics
14. Sri.A.V.Augustine, Prima Plastics
15. Sri.Noushad Naina, Crust 'n' Crumbs
16. Sri.E.G.Jibulal, Coinco Plast
17. Sri.Samhu.K.K, Kaveri Pet and Polyforms Pvt Ltd
18. Sri.Girish.P.M, Magnam Plast Products
19. Sri.G.Retnakaran, R.K.Exports
20. Sri.O.B.Anilkumar, Balus Polymer's
21. Sri. Adv.Ziyad Rahman, Counsel for Premier Marine Enterprises
22. Sri.K.P.Ahamed Kunju, R.K.Industries
23. Sri.Francis, KSSIA
24. Sri.Johny Varghees, Azarel Rubtech
25. Sri.N.C.Philip, AE PEE Rubber Industries
26. Sri.Abraham Zacharia, Perumacheril Rubber Industries
27. Sri.Ajay Aravind.A.R, Facility Manager, RRPonnelley, Technopark
28. Sri.Manu.S.Nair, Prema Agro Ltd
29. Sri.Jayan.V.R, Dy.Manager, Infopark
30. Sri.Joseph Varghese, IDS, Technopark
31. Sri.Jolly John, Brahmins Enterprises
32. Sri.Vijay, Sr.Manager
33. Adv.A.Abdul Khan, Alen & Joy Ice
34. Sri. Arun Balan, Saroj Industries
35. Sri.A.L.Dakhari, GE Army
36. Sri. M.K.Thampan, AGEE
37. Smt.K.Sreelatha, Kerala State Science & Technology Museum & Priyadarsini Planetarium
38. Sri.Johny Abraham,
39. Sri.S.K.Yesudasan, Rtd Engineer
40. Sri.K.M.Thomas, Sobha Rubber.I.E.P.O

41. Sri.SathiaRaj, Rubber Park
42. Sri.P.A.Azeez Kunju, Mannar
43. Sri.Faizal Azeez, Alstar Mannar
44. Sri.Kurian.P.Thomas, Aswathi
45. Sri.K.Madhavan, Solve Plastics
46. Sri.V.S.Jeevakumar, Jeevan Food and Spice
47. Sri. Prasannakumar.R., Aswathy Clothing Pvt Ltd
48. Sri. Shaji, A One Bottles & Plastics
49. Sri.P.K.Krishnakumar, Technopark

HOTEL NALANDA, KOZHIKODE (05.01.09)

1. Sri.V.M.Aliyas, Sawmill Owners Assn.
2. Sri.C.K.Abu, Sawmill Owners Assn
3. Sri.Shaji Sebastian, KSSIA
4. Sri.T.H.Badarudeen, KSSIA
5. Sri.M.Prabhakaran, Kerala Power Factory Owners' Assn.
6. Sri.M.Pareeth Muhammad, Ansy Rock Industries
7. Sri.K.Hassan Koya, Kerala Vyapari Vyavasai Ekopana Samithi
8. Sri.C.Narayanankutty, Vellinezhi Rice Flour and Oil Mill
9. Sri.Ramachandran.P, Krishna Steel Rolling Mills
10. Sri.M.Ramdas, Electrical Consultant, KSTC, Malabar Spinning & Weaving Mills
11. Sri. Santh Purushothaman, Puthiyangadi
12. Sri.Mavalli Raghavan, Power Loom Workers Union
13. Sri.Janardhanan, Edakkad Area, Power Loom Owners Assn.
14. Sri.K.Sameesha
15. Sri.T.A.Mammed Koya,
16. Sri. C.Balakrishnan, Aiswarya Ice Plant
17. Sri.P.P.Mahanta, KDHP Co Pvt Ltd
18. Sri.R.Jeyaraman, KDHP Co Pvt Ltd
19. Sri.Hassan.K, Palakkad
20. Smt. K.Sabiya, Kannur
21. Sri. A Basheer, Metro Collection
22. Sri.Sabeer.K.P, AFLAH Fancy
23. Sri.A.K.Ajayan, Wood Craft Organisation
24. Sri. C.Krishnan Kutty, Wood Craft Organisation
25. Smt.Rugmini.C, Otappalam
26. Sri.M.Khalid, KSSIA
27. Sri.Basheer, K.V.V.E.S
28. Sri. K.P.Moidan Koya, K.V.V.E.S
29. Sri.K.P.Abdusameed, Teens Eva International
30. Sri.M.K.Babu, Vimal Foodware Industries
31. Sri.P.Jayaram
32. Sri.Shahul Hameed, KVVES
33. Sri.Sudheer Babu.A, Managing Partner, Gangeyam Ice Factory

34. Sri.K.Abdul Basheer, KVVES
35. Sri.C.M.Imbichi, Puthiyangadi
36. Sri.Nirmal Kumar, Malappuram Roller Flour Mills
37. Sri.K.Rajan, Puthiyangadi
38. Sri.L.Mani, Methottuthazham
39. Sri.Surendran, KVVES
40. Sri. S.K.R
41. Sri.P.V.A.Siddoyo, G.H.Road
42. Sri.P.V.Surendran, IInd gate
43. Sri.K.P.Khalid, Good Buy Soaps & Cosmetics Pvt Ltd
44. Sri. A.Madhavan, West Hill, Kozhikode
45. Sri.C.P.Abdul Rahman, KVVES
46. Sri.M.Ummarkoya, Feroke
47. Sri.N.P.Abdul Rasheed, Palai
48. Sri.Premanand, RF Ice Plant
49. Sri.Rajeev.C, Sreesons Stone Works
50. Sri.P.Asokan, Prakash Stone
51. Sri.K.Sethu Madhavan, Dist Secretary, Kerala Vyapari Vyavasi Ekopana Samithi
52. Sri.K.P.Sreedharan, KVVES
53. Sri.K.Suresh, Kollam Unit
54. Sri.V.K.Moideen Koya,
55. Sri.ChandranPuthikkoth
56. Sri.V.P.Mohammad, Madeena Ice Factory
57. Sri.K.P.Moideeb Kuttym KPM Granit
58. Sri.Abbas.V.N, Oil Mills
59. Sri.E.Sudeer, Himalay Ice Factory
60. Sri.T.T.Asokan,
61. Sri.P.V.Abdul, G.H.Road
62. Sri.Saleem, G.H.Road
63. Sri.Sathian.P, Fibre Foam (P) Ltd
64. Sri.C.N. Sivan, Kannur
65. Sri.Serina Siddique, Puthiyangadi
66. Sri.Rajeev.T.V., Koya Road
67. Sri.A.Rajan, KSEB
68. Sri.M.Sulfikar, Puthiyangadi
69. Sri.Abdul Latheef, Kozhikode