



**Submission on Draft RERC (Electricity Supply Codes
and Connected Matters) Second Amendment,
Regulations, 2025**

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1. Introduction

In exercise of the powers conferred under Sections 43 to 48, 50, 55, and 56 read with Section 181 of the Electricity Act, 2003, the Rajasthan Regulatory Electricity Commission (the Commission) had specified the *Rajasthan Electricity Regulatory Commission (Electricity Supply Code and Connected Matters) Regulations, 2021* (the Principal Regulations). Subsequently, the Discoms filed Petition Nos. RERC/2247/2024, RERC/2262/2024, and RERC/2346/2025, elaborating certain issues and seeking the Commission's intervention for the removal of difficulties in the implementation of the said Regulations. In the above matters, the Commission, vide its orders dated 11.12.2024 (in Petition Nos. 2247/2024 and 2262/2024) and 04.08.2025 (in Petition No. 2346/2025), observed that the issues involved necessitate amendments to the *RERC (Electricity Supply Code and Connected Matters) Regulations, 2021*.

Accordingly, the Commission has now issued the *Draft RERC (Electricity Supply Code and Connected Matters) (Second Amendment) Regulations, 2025* (the Draft Regulations), inviting comments and suggestions from stakeholders. Centre for Energy, Environment and People, Jaipur is making the present submission in response to the Draft Regulations and requests that the Commission takes these submissions on record.

2. Section-wise Comments

2.1. Comments on Regulation 11.7(d): Outstanding Dues Against Permanently Disconnected Connection

Regulation 11.7(d) of the Draft Regulations states that *"Any outstanding dues against any permanently disconnected connection shall be recoverable from another existing/ new connection in the name of the Owner/ Occupier by serving a notice of thirty (30) days. An opportunity of personal hearing and reply of the notice shall be given to the consumer and thereafter, a speaking order shall have to be issued by the licensee after due consideration of the reply of the notice as well as facts furnished during personal hearing. No recovery shall be affected/disconnection made, without the issue of speaking order. If the consumer is aggrieved with the speaking order, he shall be at the liberty to approach the appropriate consumer grievance redressal forums."*

It is hereby submitted that the provisions under the Draft Regulations or the Principal Regulations do not clearly define timelines or procedures for the recovery of outstanding dues proposed in Regulation 11.7(d). In this context, it may be noted that Chapter 12 of the Principal Regulations on *"Unauthorized Use, Theft and Tampering"* outlines a comprehensive procedures and clearly defined timelines. A similar approach may be considered under Clause 11.7(d), by incorporating procedures and timelines similar to the ones established in Chapter 12. Such measures would help streamline consumer grievance redressal, ensure timely resolution, align with consumer expectations, and improve overall service efficiency.

Therefore, we respectfully request the Commission to mandate the provision of a personal hearing opportunity to the consumer, to be scheduled no earlier than 30 days from the date

of issuance of the notice, allowing sufficient time for the consumer to present their views. Furthermore, we request that directions be issued to prevent disconnection of supply in cases where the consumer is aggrieved by the speaking order and has approached the appropriate Consumer Grievance Redressal Forum, as specified in the speaking order, within a period of at least 30 days. Any further action by the licensee or franchisee should be taken only in accordance with the decision of the said redressal forum.

2.2. Comments on Section 11.8: Provision of Reconnection

Regulation 11.8 (d) states that: *“Provided that applicant applying for reconnection will be considered as new consumer after expiry of period one year in case of HT/EHT consumers and two years in case of other consumers (other than HT and EHT) from the date of disconnection, if line material is removed by the licensee and has to bear the cost of line and plant.”*

In order to ensure transparency for consumers regarding the proposed timeline for reconnection, we request the Commission to include a sub-proviso mandating that the licensee issue a formal notification at least 30 days in advance to the consumer through all registered communication channels (registered email, SMS, and registered/speed post) prior to such removal. This notification should clearly specify the proposed date on which the line is to be removed by the licensee, along with the final date for consideration of reconnection.

The Discom should also notify the consumer after the removal of the line material, clearly indicating the proposed timeline for reconnection. Implementing such a measure would help align consumer expectations and significantly enhance the transparency and efficiency of service delivery.

3. Comments on Schedule – I

3.1. Introduction of new slabs and revision of charges

The proposed amendments introduce significant changes to various charges related to electricity supply and associated services, which require simplification and a clear cost breakdown for better consumer understanding. As the amendments propose a new schedule of charges with slab categories that differ from the existing slabs in Part 2.1(a) of Schedule–I in the Principal Regulations, it is necessary to clarify whether the existing schedule will be entirely revised or replaced by the newly proposed provisions.

Additionally, we have conducted a comparative analysis of the proposed charges with those in two other states (Maharashtra and Andhra Pradesh) and have provided suggestions based on this evaluation in the following table. Notably, the Petitioner has proposed more than doubling the charges from existing schedule at multiple instances without providing any rationale or computation for this increase. We request the Commission to demand a computation from the Petitioners, failing which the Commission may consider the schedule provided below. Revisions from the proposed schedule is marked in bold, and the rationale for such revision is provided in the corresponding ‘Remarks’ column of the schedule.

i) For Overhead line:

Sr. No.	Category of Consumer	Amount to be deposited (Rs.)	Schedule of Charges of Maharashtra	Schedule of Charges of Andhra Pradesh	Related Regulation & Remarks
1.	Domestic	Tribal sub plan: Rs. 750/-	-	-	6.1
		Rural: <u>Up to 5 kW:</u> Single-phase: Rs. 1700 Three-phase: Rs. 2000 Urban: <u>Up to 5 kW:</u> Single-phase: Rs. 1700 Three-phase: Rs. 3500	<u>Above 0.5 kW & Up to 7.5 kW:</u> Single-phase: 1700 <u>Up to 20 kW:</u> Three-phase: 7200	<u>Above 1kW & up to 20kW:</u> Rs. 1500 + Rs. 2000 per kW or part thereof of the contract load	6.1 We suggest different deposited amount for single-phase and three-phase consumers upto 5 kW for both urban and rural applicants because most of the single-phase consumers who reside both in urban and rural areas are generally BPL category and small consumers whose economical affordability to consume electricity is usually lower than the consumers opting for three-phase connections.
		Rural & Urban: <u>More than 5 kW up to 45 kW:</u> Single-phase/ Three-phase: Rs.5000/- plus additional sum @ Rs. 300 per kW or part thereof beyond 5 kW.	<u>Up to 20 kW:</u> Three-phase: Rs. 7200 <u>above 20 kW but up to 80 kW:</u> Three-phase: Rs. 12,600	<u>Above 1kW & up to 20kW:</u> Rs. 1500 + Rs. 2000 per kW or part thereof of the contract load <u>Above 20kW & up to 150kW:</u> Rs. 12,600 per kW or part thereof of the contract load	6.1 Without a proper rationale from the Petitioner for doubling the additional rate from existing schedule is unreasonable. We, therefore, propose decreasing rate of additional sum from @Rs.500 to @Rs.300. The new proposed amount is already more than double from existing amount.
		Rural & Urban: More than 45kW up to 150kW: Three-phase: Rs.90,000/- plus additional sum @ Rs. 300/- per kW or part thereof beyond 45 kW.	<u>above 20 kW but up to 80 kW:</u> Three-phase: Rs. 12,600 <u>above 80 kW but up to 150 kW:</u> Three-phase: Rs. 21,600	<u>Above 20kW & up to 150kW:</u> Rs. 12,600 per kW or part thereof of the contract load	6.1 We suggest revising the additional sum @Rs. 300 per kW since proposed additional sum for this slab is @Rs. 650 per kW which is more than triple and not justifiable to inflate so much.
2.	Non-Domestic	<u>Up to 5 kW:</u> Single-phase: Rs. 1700/- Three-phase: Rs. 5000/-	<u>Above 0.5 kW & Up to 7.5 kW:</u> Single-phase: 1700 <u>Up to 20 kW:</u> Three-phase: 7200	<u>Above 1kW & up to 20kW:</u> Rs. 1800 + Rs. 2000 per kW or part thereof of the contract load	6.1 We suggest less amount deposition for single-phase connection because most of them in this category are small shop owners in rural and urban areas.
		<u>More than 5 kW up to 45 kW:</u> Single-phase/ Three-phase: Rs. 5000/- plus additional sum @ Rs. 400/- per kW or part thereof beyond 5 kW	<u>Up to 20 kW:</u> Three-phase: Rs. 7200 <u>above 20 kW but up to 80 kW:</u> Three-phase: Rs. 12,600	<u>Above 1kW & up to 20kW:</u> Rs. 1800 + Rs. 2000 per kW or part thereof of the contract load <u>Above 20kW & up to 150kW:</u> Rs. 12,600 per kW or part thereof of the contract load	6.1 We suggest decreasing the rate of additional sum @Rs.400 from @Rs.650. The new proposed amount is already more than double from existing amount.
		More than 45 kW up to 150 kW: Three-phase: Rs. 1,00,000/- plus additional sum @ Rs. 500/- per kW or part thereof beyond 45 kW	<u>above 20 kW but up to 80 kW:</u> Three-phase: Rs. 12,600 <u>above 80 kW but up to 150 kW:</u> Three-phase: Rs. 21,600	<u>Above 20kW & up to 150kW:</u> Rs. 12,600 per kW or part thereof of the contract load	6.1 The proposed rate of additional sum @Rs. 750 is more than double than of existing additional sum @Rs. 300. So we recommend additional sum @Rs.500 per kW for this slab which is also a good increment from existing one.

3.	Public Street Lighting	Rs. 5,000/- per connection. This does not include line/network cost.	-	-	6.1
4.	Small Industry	<u>Up to 5 kW:</u> Single-phase/ Three-phase: Rs. 5000/-	<u>Up to 7.5 kW:</u> Single-phase: 1700 <u>Up to 20 kW:</u> Three-phase: 7200	<u>Up to 20 kW:</u> Rs. 2000 per kW or part thereof of contracted load	6.1
		More than 5 kW up to 18.65 kW (25 HP)¹: Single-phase/ Three-phase: Rs. 5000/- plus additional sum @Rs. 300/- per kW or part thereof beyond 5 kW	<u>Up to 20 kW:</u> Three-phase: 7200	<u>Up to 20 kW:</u> Rs. 2000 per kW or part thereof of contracted load	6.1 Proposed rate of additional sum of Rs. 650/kW is more than double from the existing Rs.300/kW. We suggest to keep additional sum of Rs.300/kW which is quite reasonable for these small industries like cottage industries, hatcheries, dyeing & printing industries, handicraft etc., which mostly set up in rural and peri urban set ups and provide effective economic development and jobs to local people.
5.	Medium Industry & Mixed Load	More than 18.65 kW (25 HP) up to 45 kW: Three-phase: Rs. 12,000/- plus additional sum @Rs. 400/- per kW or part thereof beyond 18.65 kW	<u>Up to 20 kW:</u> Three-phase: 7200 <u>above 20 kW but up to 80 kW:</u> Three-phase: Rs. 12,600	<u>Up to 20 kW:</u> Rs. 2000 per kW or part thereof of contracted load <u>Above 20kW & up to 150kW:</u> Rs. 12,600 per kW or part thereof of the contract load	6.1 We propose to keep existing additional sum @Rs. 400/kW instead of Draft Regulation's additional sum @Rs. 750/ since no computation for this increase is provided.
		More than 45 kW & up to 150 kW: Three-phase: Rs. 1,00,000/- plus additional sum @Rs. 750/- per kW or part thereof beyond 45 kW	<u>above 80 kW but up to 150 kW:</u> Three-phase: Rs. 21,600	<u>Above 20kW & up to 150kW:</u> Rs. 12,600 per kW or part thereof of the contract load	6.1 We propose to keep rate of additional sum @Rs. 750/kW as no rationale has been provided in the Draft Regulation.

ii) For Underground line:

Sr. No.	Category of Consumer	Amount to be deposited (Rs.)	Schedule of Charges of Maharashtra	Schedule of Charges of Andhra Pradesh	Related Regulation & Remarks
1.	Domestic	Tribal sub plan: Rs. 750/-	-	-	6.1
Rural: <u>Up to 5 kW:</u> Single-phase/ Three-phase: Rs. 2000 Urban: <u>Up to 5 kW:</u> Single-phase: Rs. 2000 Three-phase: Rs. 3500		<u>Above 0.5 kW & Up to 7.5 kW:</u> Single-phase: 7,600 <u>Up to 20 kW:</u> Three-phase: 13,800	<u>Above 1kW & up to 20kW:</u> Rs. 1500 + Rs. 2000 per kW or part thereof of the contract load	6.1 We suggest different deposited amount for single-phase and three-phase applicant of up to 5 kW because most of the single-phase consumers are in BPL category and small consumers who resides in both urban and rural area whose economical affordability to consume electricity is usually lower than the three-phase consumption.	
Rural & Urban: <u>More than 5 kW up to 45 kW:</u> Single-phase/ Three-phase: Rs.5000/- plus		<u>Up to 20 kW:</u> Three-phase: Rs. 13,800	<u>Above 1kW & up to 20kW:</u> Rs. 1500 + Rs. 2000 per kW or part thereof of the contract load	6.1 We recommend additional sum @Rs. 500/kW instead of proposed additional sum @Rs. 750/kW.	

¹ Rajasthan Electricity Regulatory Commission (Terms and Conditions for Determination of Tariff) Regulations, 2019

		additional sum @ Rs. 500 per kW or part thereof beyond 5 kW.	<u>above 20 kW but up to 50 kW:</u> Three-phase: Rs. 24,300	<u>Above 20kW & up to 150kW:</u> Rs. 12,600 per kW or part thereof of the contract load	Petitioner should provide computation of additional sum with cost break up.
		Rural & Urban: More than 45kW up to 150kW: Three-phase: Rs.90,000/- plus additional sum @ Rs. 850/- per kW or part thereof beyond 45 kW.	<u>above 20 kW but up to 50 kW:</u> Three-phase: Rs. 24,300 <u>above 50 kW but up to 100 kW:</u> Three-phase: Rs. 46,900 <u>above 100 kW but up to 150 kW:</u> Three-phase: Rs. 71,100	<u>Above 20kW & up to 150kW:</u> Rs. 12,600 per kW or part thereof of the contract load	6.1 Additional sum @Rs.2000 is quite high to get a new connection for consumers with a load above 45 kW and up to 150 kW in the domestic category, we suggest revising the amount @Rs. 850/ kW.
2.	Non-Domestic	<u>Up to 5 kW:</u> Single-phase: Rs. 2000/- Three-phase: Rs. 5000/-	<u>Above 0.5 kW & Up to 7.5 kW:</u> Single-phase: 7,600 <u>Up to 20 kW:</u> Three-phase: 13,800	<u>Above 1kW & up to 20kW:</u> Rs. 1800 + Rs. 2000 per kW or part thereof of the contract load	6.1 We suggest less amount deposition for single-phase connection because most of them in this category are small shop owners in rural and urban areas.
		<u>More than 5 kW up to 45 kW:</u> Single-phase/ Three-phase: Rs. 5000/- plus additional sum @ Rs. 650/- per kW or part thereof beyond 5 kW	<u>Up to 20 kW:</u> Three-phase: Rs. 13,800 <u>above 20 kW but up to 50 kW:</u> Three-phase: Rs. 24,300	<u>Above 1kW & up to 20kW:</u> Rs. 1800 + Rs. 2000 per kW or part thereof of the contract load <u>Above 20kW & up to 150kW:</u> Rs. 12,600 per kW or part thereof of the contract load	6.1 Proposed additional sum @Rs. 850/- per kW or part thereof beyond 5 kW is quite higher in the proposed draft regulation.
		More than 45 kW up to 150 kW: Three-phase: Rs. 1,00,000/- plus additional sum @ Rs. 850/- per kW or part thereof beyond 45 kW	<u>above 20 kW but up to 50 kW:</u> Three-phase: Rs. 24,300 <u>above 50 kW but up to 100 kW:</u> Three-phase: Rs. 46,900 <u>above 100 kW but up to 150 kW:</u> Three-phase: Rs. 71,100	<u>Above 20kW & up to 150kW:</u> Rs. 12,600 per kW or part thereof of the contract load	6.1 The proposed additional sum @Rs. 2200 looks too much and no rationale provided for the same. We suggest additional sum @Rs. 850/kW.
3.	Public Street Lighting	Rs. 5,000/- per connection. This does not include line/network cost.	-	-	6.1
4.	Small Industry	<u>Up to 5 kW:</u> Single-phase/ Three-phase: Rs. 5000/-	<u>Above 0.5 kW & Up to 7.5 kW:</u> Single-phase: 7,600 <u>Up to 20 kW:</u> Three-phase: 13,800	<u>Up to 20 kW:</u> Rs. 2000 per kW or part thereof of contracted load	6.1
		More than 5 kW up to 18.65 kW: Single-phase/ Three-phase: Rs. 5000/- plus additional sum @Rs. 500/- per kW or part thereof beyond 5 kW	<u>Up to 20 kW:</u> Three-phase: 7200	<u>Up to 20 kW:</u> Rs. 2000 per kW or part thereof of contracted load	6.1 Proposed additional sum of Rs. 850/kW is almost triple from the existing Rs.300/kW. We suggest additional sum of Rs.500/kW which is same as above for domestic and non-domestic consumers within this connected load.

5.	Medium Industry & Mixed Load	More than 18.65 kW up to 45 kW: Three-phase: Rs. 20,000/- plus additional sum @Rs. 650/- per kW or part thereof beyond 18.65 kW	Up to 20 kW: Three-phase: 7200 above 20 kW but up to 50 kW: Three-phase: Rs. 24,300 above 50 kW but up to 100 kW: Three-phase: Rs. 46,900 above 100 kW but up to 150 kW: Three-phase: Rs. 71,100	Up to 20 kW: Rs. 2000 per kW or part thereof of contracted load Above 20kW & up to 150kW: Rs. 12,600 per kW or part thereof of the contract load	6.1 We propose additional sum @Rs. 650/ instead of draft regulation additional sum @Rs. 850/. Also, no rationale has been provided in the draft regulation for application fee.
		More than 45 kW up to 150 kW: Three-phase: Rs. 1,00,000/- plus additional sum @Rs. 850/- per kW or part thereof beyond 45 kW	above 20 kW but up to 50 kW: Three-phase: Rs. 24,300 above 50 kW but up to 100 kW: Three-phase: Rs. 46,900 above 100 kW but up to 150 kW: Three-phase: Rs. 71,100	Above 20kW & up to 150kW: Rs. 12,600 per kW or part thereof of the contract load	6.1 We propose additional sum @Rs. 850/ instead of draft regulation additional sum @Rs. 2200/. Also, no rationale has been provided in the draft regulation.

3.2. Comment on Note of Schedule-I:

The note on the Draft Schedule states that: *“In case of 11 kV oil switch / RMU is to be installed as per rule then same shall be provided by applicant and in such case Rs. 24,000/- in place of Rs. 90,000/ and Rs 34,000/- in place of Rs. 1,00000/- to be read for connections for load more than 45 KW, however, Supervision charges fixed @ Rs.10,000/- will be charged towards Switchgears, HT cable etc.”*

It is hereby submitted that, in the case of an RMU provided and installed by the licensee under the proposed charges specified in Schedule-I, it is imperative to prescribe a minimum warranty period effective from the date of installation.

3.3. Applicability of Service Line in Rural Area

It is submitted that applicability of 300 meters of service line in case of domestic and non-domestic applicants and 200 meters for industrial and mix load applicants whose premises fall within available 24-hour supply three-phase LT network will discourage many potential applicants in rural areas to apply for new electricity connections, which ultimately goes against the principle of equity. It is therefore proposed to extend service line permissibility in case of rural areas due to large operational & maintenance area of discoms in rural areas. It may be noted that the Andhra Pradesh Electricity Regulatory Commission prescribes similar charges for connections up to 150 kW (new or additional load) located within a one kilometre radius of the existing electrified network, with the maximum permissible length of the service line not exceeding one kilometre.

We therefore request the Commission to increase the network length up to 1,000 meters in case of new connection in rural areas for up to load 150 kW.

3.3.1. Schedule-I, 2.2 (a):

Sr.No	Category of Consumer	Amount to be deposited in addition to sum payable under item 2.1 above	Related Clause
1.	Domestic and Non-Domestic	<p>In Rural Area: For extension of distribution mains and/or service line beyond 1,000 metres- (a) For single-phase supply: Rs150/metres (b) For three-phase supply: Rs225/metres</p> <p>In Urban Area: For extension of distribution mains and/or service line beyond 300 metres (a) For single-phase supply: Rs150/metres (b) For three-phase supply: Rs225/metres</p>	7.2 & 7.3
2.	Public Street Lighting	Actual material cost + labour and overhead charges as applicable	
<u>3</u>	Small Industry, Medium Industry & Mixed load	<p>In Rural Area: For extension of distribution mains and/or service line beyond 1000 metres (a) For single-phase supply: Rs150/metres (b) For three-phase supply: Rs225/metres</p> <p>In Urban Area: For extension of distribution mains and/or service line beyond 200 metres (a) For single-phase supply: Rs150/metres (b) For three-phase supply: Rs225/metres</p>	