

● PRAYAS

Initiatives in Health, Energy,
Learning and Parenthood



Amrita Clinic, Athawale Corner, Karve Road Corner, Deccan Gymkhana, Pune 411 004; INDIA

Tel.: (020) 65205726: Fax: (020) 2542 0337. E-mail: energy@prayaspune.org Web-site: www.prayaspune.org

April 23, 2012

To,
The Chairman,
MERC
Mumbai

Subject: Making the second CPRI study public and ensuring accurate documentation of objections and suggestions in commission's orders.

Dear Sir,

During the public hearing dated 12th April 2012 in case no 6 of 2012 related to MSPGCL's petition for final Truing up for FY 2010-11, Annual Revenue Requirement and Tariff for FY 2011-12 & FY 2012-13, the Managing Director of MSPGCL referred to second of subsequent study by CPRI. However there is no mention of this report or its terms of reference on the commission's website. We request the Commission that both the report and its terms of reference should be made public as soon as possible. Ideally this information should have been in public domain prior to the public hearing as MSPGCL referred to its findings in the hearing and the same may imply significant tariff impact for consumers. We hope the commission will take due cognizance of this aspect and in the interest of transparency and informed debate, make the information public as soon as possible.

MERC has had a tradition of well documented orders that clearly and accurately reflect all the comments and suggestions made during the tariff hearings. Traditionally all the orders have a section that captures objections and suggestions made by consumers followed by utility's response and Commission's ruling regarding the same. This structure is very useful for consumers to understand commission's thinking on various issues. However recent orders such as the MSEDCL tariff order dated 30th December 2011 did not capture all comments and submissions and also did not include Commission's ruling on individual objections or suggestions. Ensuring correct documentation of submissions made by all participants in tariff hearings is of utmost importance for two reasons:

- a) People's faith in regulatory process is rooted in its transparency and accountability which is reflected through such processes and
- b) In case the commission or utility does not agree with a particular objection or suggestion, proper documentation of the same is critical to facilitate further legal recourse to the concerned party, if needed.

We believe that the Commission appreciates the importance of this process and will ensure that old tradition of proper documentation of all suggestions and objections is continued and high standards of quality of tariff order are maintained.

We sincerely hope that the commission will take note of the above requests and do the needful.

Thanking you

Sincerely

Ashwini Chitnis & Shantanu Dixit
Prayas Energy Group, Pune