

**BEFORE THE HARYANA ELECTRICITY REGULATORY COMMISSION AT
PANCHKULA**

Case No. HERC/P. No. 77 of 2025

Date of Hearing : 07/04/2026

Date of Order : 17/04/2026

IN THE MATTER OF:

Complaint under Section 142, 146 and 149 of Electricity Act, 2003 for violating the order dated 11/03/2025 passed in DH/CGRF/4777/2024 by the Hon'ble Consumer Grievances Redressal Forum, DHBVN and for violating the various circular and Regulation passed by this Hon'ble Commission.

Petitioner

M/s Deepanshu Projects Pvt. Ltd., 1ST Floor, Tower-C, Vatika First India Place, M.G. ROAD, Gurugram, Through Sh. Naveen Singla, Authorized Signatory.

VERSUS

Respondent:

1. Dakshin Haryana Bijli Vitran Nigam Limited, Vidyut Sadan, Vidyut Nagar, Hisar, Through its M.D.
2. S.D.O. S/DIVISION, Kherki Daula, Dakshin Haryana Bijli Vitran Nigam Limited, Gurugram.

Present

On behalf of the Petitioner

Sh. B. P. Agarwal, Advocate

On behalf of the Respondent

1. Ms. Aerika Singh, Advocate
2. Sh. Lovepreet Singh, Advocate
3. Ms. Prieya Ahluwalia, Advocate
4. Ms. Suman Kashyap, SDO, DHBVN
5. Sh. Shiv Shakti, CA, DHBVN

QUORUM

**Shri Nand Lal Sharma, Chairman
Shri Mukesh Garg, Member
Shri Shiv Kumar, Member**

ORDER

1. **Petition:**

- 1.1 That the present Complaint is being filed by the Complainant as the respondents have failed to comply with the order dated 11/03/2025 passed by Hon'ble Consumer Grievance Redressal Forum, Dakshin Haryana Bijli Vitran Nigam, Hisar, Haryana in case bearing DH/CGRF/4777/2024. Copy of Orders 11/03/2025 passed by CGRF in DH/CGRF/4777/2024 is enclosed.
- 1.2 That the brief facts of the case are as given below :-
- i. That the Complainant M/S Deepanshu Projects Private Limited has authorized Sh. Naveen Singla, to sign, file, verify, etc the complaint on behalf of the company for the recovery of the excess amount paid to the DHBVN. Copy of Orders 11/03/2025 passed by CGRF in DH/CGRF/4777/2024 is enclosed.
 - ii. That the Complainant has constructed the housing society for residential purpose and for which an electricity connection was obtained through Account No. 4385433000, Sub Division: Kherki Daula, which was sanctioned in the name of M/S DEEPANSHU PROJECTS. with the contract demand of 1760 KW sanctioned for bulk supply domestic supply and paid the Security deposit of Rs. 43,60,000/-which is as per the bill. Copy of the electricity bill is enclosed.
 - iii. That there are 863 flats in the society including 132 EWS flats and occupancy certificate was issued on 17/07/2017 vide Memo no. ZP-705/SD(BS)/2017/17960, and after issue of the Occupancy certificate all the flats were occupied by the residents of the society and accordingly they are billed by the society and hence all the 863 residents of the society are entitled for the slab benefit. Copy of the Occupancy certificate is enclosed.
 - iv. That since as per bill the connection was energized on 18/08/2018 and hence as per the tariff order issued every year by this Hon'ble Commission starting from 2013 and as per Regulation issued from time to time, Single Bulk Supply Consumers are entitled for the slab benefit w.e.f. from the date of connection i.e. from 18/08/2018 and slab benefit is required to be continued as per provision of law but no slab benefit was given to my client from 18/08/2018 for all 863 dwelling units.
 - v. That the complainant has deposited security deposit/ACD amounting to Rs. 43,60,000/-which was paid as demanded by respondent and as per Section 154(4) of Electricity Act, 2003, respondents are liable to pay the interest on the security deposit from the date of deposit of the security amount at bank rate in the month of April each year but the same was not given in the month of April.
 - vi. That as per the Directive issued by HERC under clause 5.8.1 & 5.8.2 of Regulation No. 34/2016 i.e. the Haryana Electricity Regulatory Commission (Duty to supply electricity on request, Power to recover expenditure incurred in providing supply and Power to

require security) Regulations, 2016 and Sales Instruction 9/2016 , the Respondent are required to pay the interest in the month of April of each year and in case the interest accrued during the year is not adjusted in the consumer's bill for the first billing cycle of the ensuing financial year, then Respondents are liable to pay interest at the rate of 18% for the period for which the payment of interest accrued is delayed but the respondents have failed to make the payment of the interest on security deposit till date. The relevant para are reiterated as under:-

"5.8.1: The licensee shall pay interest to the consumer at the Bank rate as determined by the Reserve Bank of India on 1st April of each year or more as specified by the Commission payable annually on the Consumer's security deposit. The interest accrued during the year shall be adjusted in the consumer's bill for the first billing cycle of the ensuing financial year.

5.8.2: In case the interest accrued during the year is not adjusted in the consumer's bill for the first billing cycle of the ensuing financial year, the licensee shall be liable to pay interest at the rate of 18% for the period for which the payment of interest accrued is delayed."

7. That the Respondents have withheld the 4% rebate for the period April 2020 to Oct.2020 and hence Respondents are liable to pay the rebate of 4% for the aforesaid period.
8. That Respondents are liable to refund the excess payment paid by Complainant along with the interest as per Section 61(6) of the Electricity Act,2003.
 - i. That the Complainant has also issued the legal notice on 28.10.2024 to the respondent with the request to refund the excess amount as stated above but there was no response and hence this complaint. Copy of the legal notice dated 28.10.2024 is enclosed.
 - ii. That the respondents have withheld the 4% rebate for the period April 2020 to Oct.2020 and hence the respondents are liable to pay the rebate of 4% for the aforesaid period.
 - iii. That since the respondent have failed to comply with the Supply Code /Regulation passed by this Hon'ble Commission and various circular issued by the respondent and hence the Complainant was forced to file a Complaint before the Consumer Grievances Redressal Forum, Gurugram vide Complaint No. DH/CGRF/4777/2024. Copy of the complaint and reply are enclosed.
 - iv. That the respondents on its first reply refused to allow the slab benefit but later on considering the data supplied by the complainant agreed to allow the slab benefit and calculated the slab benefit of Rs. 1,55,91,394.10p for the period 17.08.2018 to 01/10/2024 , it was also agreed to pay the interest which was calculated to be Rs. 4,72,817/- (for FY 2023-24 and FY 2022-23) and it was also stated that for the previous period the interest will be given once the ledger data is obtained from Hatron . It was

requested to the Hon'ble Forum to direct the consumer to start the billing through unified billing system and give an under taking that the consumer will implement unified billing. Copies of reply dated 11.02.2025 and 27.02.2025 are enclosed.

- 1.3 That after considering the submission of both the parties the Hon'ble CGRF was pleased to pass the order on 11.03.2025 with the direction to the respondents to give slab benefit to 863 dwelling units as mentioned in the tariff order and as per the calculation sheet filed by the SDO, to allow 4 % for the period April 2020 to Oct. 2020 and interest on ACD as per bank rate and for delay period penal interest . Further it was directed to carry our billing through unified billing software before credit of the refundable amount to avoid such instances in the future and an undertaking for the implementation of unified billing may be submitted by the builder in accordance with the HERC Order dated 09.10.2020 and DHBVN sales circular no.23/2022.
8. That the respondent has issued the letter dated 17.03.2025 to the complainant with the request to provide an undertaking as directed by the Hon'ble Forum and accordingly undertaking was given by President of Mictrotek Greenburg Condominium Association. Copies of the letter dated 17.03.2025 and undertaking are enclosed.
9. That the complainant has also provided the entire data for the unified billing to the respondent with the request to start the unified billing and thus the complainant has complied with its own part as directed by the Hon'ble Forum.
10. That Respondents are liable to refund the excess payment paid by Complainant along with the interest as per Section 61(6) of the Electricity Act,2003 and also as per Section 2.33 of Haryana Electricity Regulatory Commission (Forum and Ombudsman) (1st Amendment) Regulations,2022. The relevant provision of regulation is reproduced as under:-
 - 2.33 *The Forum may, subject to the Supply Code, 2014, as amended from time to time, allow interest on recoverable/ refundable amount, if any, by either party as under:*
 - i) *Cases covered under 2.18 (i) above: as per Regulations 6.10.2 & 6.10.3 of Supply Code, 2014, as amended from time to time;*
 - ii) *Cases covered under 2.18 (ii) above: at SBI Base Rate prevalent on 1st of April of the relevant year.*
- 1.4 That as per Section 142 of the Electricity Act, 2003 if in case any person contravened the rules/regulation made under the Electricity Act, 2003 then he is liable to be punish under Section 142 of the Electricity Act, 2003 and in the present case the respondents have contravene the Rules/Regulation/Tariff Provision/Order passed by the Forum and hence liable for the action and hence this Complaint.
- 1.5 That Since the Complainant has constructed the housing society and the connection is obtained for the residential purpose for the members of the housing society and there is no commercial activities and hence as per rule the Complainant is not liable to pay Court fees of Rs.50,000/- as required for the Commercial connection.

- 1.6 That the cause of action arose in favour of the complainant and against the respondents when the respondents are failed to comply with the order passed by the Hon'ble CGRF within the stipulated period of 21 days..

P R A Y E R :-

In view of the above facts and circumstance it is most respectfully prayed that this Hon'ble Commission may kindly be pleased to :-

- a) Initiate an inquiry against the respondents/ against the guilty officers under section 142, 146 and 149 of Electricity Act, 2003 for violating the order dated 11/03/2025 passed by the CGRF , Gurugram, in DH/CGRF/4777/2024 as the respondents have failed to adjust the entire admitted amount for the slab benefit amounting to Rs.1,55,91,394/- till 01/11/2024 and thereafter till date and in future, interest on ACD and 4% rebate and :
- b) Direct the respondents to refund the excess paid amount along with the interest @18% and;
- c) Award the compensation and costs of present proceedings in favour of Complainant and against the Respondent and;
- d) Any other or further order which this Hon'ble Commission may deem fit and proper in the facts and circumstances of the case in favour of the Complainant in the interest of justice.

2. Reply submitted by DHBVN on 13/10/2025:

- 2.1 The present reply is being filed through Amit Kamboj XEN Dakshin Haryana Bijli Vitran Nigam, Gurugram referred to as 'DHBVN'), who is competent to file the present reply as well as fully conversant with the facts and circumstances of the case on the basis of knowledge derived from the record, on behalf of Respondents.
- 2.2 The present petition has been filed under Section 142, 146 and 149 of the Electricity Act, 2003 alleging violation of the order dated 11.03.2025 passed by CGRF, Gurugram and seeking consequent directions. The present short reply is being filed in the matter as there is no noncompliance of the Order of the Ld. CGRF, as is being projected by the Petitioner. The implementation of Order is conditional subject to the Petitioner first implementing the issuance of the invoices as per Unified Billing Software and therefore, a short composite reply is being filed at the present stage highlighting the reasons/justification for non reimbursement of the amount mentioned in the Order passed by Ld. CGRF.
- 2.3 By way of brief factual background, it is stated that M/S Deepanshu Projects Private Limited is a registered consumer of Dakshin Haryana Bijli Vitran Nigam Limited (DHBVNL) bearing Account No. 4385433000 under the jurisdiction of SDO (Operation), Sub Division, Kherki Daula, DHBVN, Gurugram. The said consumer has raised a grievance alleging that the Respondents have withheld a 4% rebate for the period April 2020 to October 2020, and has further contended that the Respondents are liable to refund the alleged excess amount paid by the consumer, along with interest, in terms of Section 61 (6) of the Electricity Act, 2003.

2.4 The consumer approached the Corporate Consumer Grievances Redressal Forum (CGRF) seeking redressal. The Ld. CGRF, vide its order dated 11.03.2025 passed in Case No. 4777/2024, directed that the consumer/builder shall carry out billing through the Unified Billing Software before credit of the refundable amount, to avoid such instances in the future, and further required that an undertaking for the implementation of the Unified Billing System be submitted by the builder in accordance with HERC Order dated 09.10.2020 and DHBVN Sales Circular No. 23/2022. The order passed by the Ld. CGRF is reproduced hereunder for your kind perusal and convenience-

“Furthermore, it is requested that the consumer/builder be directed to carry out billing through unified billing software before credit of, the refundable amount to avoid such instances in the future and an undertaking for the implementation of unified billing may be submitted by the builder in accordance with the HERC order dated 09.10.2020 and DHBVN sale circular no 23/2022.

After considering the reply of both the complainant and SDO and submissions made by them in the hearing, the Forum directed SDO/OP:

- i) To give slab benefit from the date of connection for all 863 dwelling units as mentioned in the tariff provision issued every year as submitted and calculated by SDO /OP. Kherki Daula vide Office Memo No. 3925 dt. 27.02.2025.*
- ii) To give the 4% rebate for the period April 2020 to Oct. 2020 and also for the period for which no 4% rebate was given, in the interest of justice.*
- iii) To pay the interest on Security deposit-Rs.4360000/- as claimed by complainant as per the bank rate from the date of deposit of the security deposit/ACD amount and for delayed period @18% as per the Sales Instruction (SC 34/2016 and others) after verification of record.*

Furthermore, consumer/builder is directed to carry out billing through unified billing software before credit of the refundable amount to avoid such instances in the future and an undertaking for the implementation of unified billing may be submitted by the builder in accordance with the HERC order dated 09.10.2020 and DHBVN sale circular no 23/2022.” (Emphasis Supplied)

2.5 As is apparent from the reading of the foregoing order, the compliance of the refundable amount by the Respondents can only be made once the Petitioner submits an undertaking and carry out billing through Unified Billing Software, which is a pre-condition for the Respondent to act further in terms of the Order. This pre-condition was mandated to ensure that the rebate amount released by the Respondent to the consumer/builder is duly passed on to the residents for their benefit, and that the said amount is not misappropriated or misused by the consumer/builder in any manner.

2.6 The Unified Billing Software has been developed to efficiently manage the billing operations of the builder, strengthen financial management, and enhance operational efficiency. The Respondent to

monitor and verify that the rebate granted is appropriately utilized and that there is no arbitrary or inflated billing by the Petitioner. It further ensures that the energy bills raised by the consumer/builder are in accordance with the schedule prescribed by the Hon'ble HERC/DHBVN. It also facilitates the maintenance of comprehensive billing data, which can be utilized for improved service delivery, transparency and informed decision-making.

- 2.7 It is also respectfully submitted that the Respondents have never intended to disregard or disobey the directions of the Hon'ble CGRE. The non-compliance, if any, has not arisen from any deliberate or wilful inaction on part of DHBVN but solely due to the failure of the consumer/builder to perform the prerequisite action mandated by the Forum's order, i.e., uploading the Unified Billing Software and furnishing the requisite undertaking.
- 2.8 The order of the Ld. CGRF clearly stipulates that the refund or adjustment of the excess amount was conditional upon the builder's compliance with the requirement of implementing the Unified Billing Software. However, till date, the consumer/builder has failed to submit the undertaking or implement the Unified Billing as required under the said directions. Therefore, the onus of non-compliance rests entirely upon the consumer and not on the Respondents.
- 2.9 It is also pertinent to mention that to demonstrate bona fides, the Respondents had issued letters dated 17.03.2025 and 09.10.2025 to the consumer/builder seeking compliance with the Ld. CGRF's order and requesting the consumer/builder to submit the undertaking as has been directed by the CGRF to enable the release of the excess amount. Despite such communication, the consumer has not responded or complied with the requirements, rendering compliance from DHBVN's side procedurally incomplete. However, no response or compliance to the same has been made by the Petitioner. Copies of the letters dated 17.03.2025 and 09.10.2025 are appended herewith marked as Annexure R-1 and Annexure R-2 respectively.
- 2.10 In light of the above-mentioned factual position, it is submitted that the Respondents have acted in good faith and in adherence to the directions of the Ld. CGRF. The delay, if any, is not attributable to the Respondents but to the non-compliance of the consumer/builder.

PRAYER

In view of the foregoing, it is most respectfully prayed that this Hon'ble Commission may kindly-

- a) Take note of the fact that DHBVN has already taken all necessary steps for compliance of the CGRF Order dated 11.03.2025,
- b) Hold that any non-compliance, if alleged, is solely due to the builder's failure to submit the required undertaking and implement the Unified Billing Software,
- c) Not impose any penalty or cost upon the Respondents, as the delay or non-compliance is neither deliberate nor intentional, and/or
- d) Pass any other or further order(s) as may be deemed fit and proper in the facts and circumstances of the case, in the interest of justice.

3. The case was heard on 15/10/2025, Ms. Sonia Madan counsel for the respondent submitted that the reply has been submitted with advance copy to the petitioner. Sh. B. P. Aggarwal counsel for the petitioner requested for some time to file the rejoinder. Acceding to request of the petitioner, the Commission adjourns the matter and directs the petitioner to file its rejoinder with in three (3) weeks, with advance copy to the respondent..

4. Rejoinder of petitioner submitted on 01/12/2025:

4.1 That the contents of the para no.1 of the reply filed by the respondents needs no reply.

4.2 That the contents of the para no.2 of the reply filed by the respondents are wrong and denied except the Complaint / Petition is filed because order passed by the Hon'ble CGRF was not complied with. It is submitted that the data for the month of May and June 2025 was uploaded in the system by the Complainant with the help of the respondents and thereafter the data could not be uploaded despite the efforts made by the Complainant. The Complainant sent several email to the respondents in this regard but no reply was ever received from the respondents and no help was given by the respondents. Now, when the counsel for the Complainant talk to the concerned SDO and sent email along with the data to the respondent, a reply was received from the respondents alleging that the Complainant was using wrong password /ID. whereas the Complainant is using the correct password/ID as provided by the respondents but the only problem that the data could not be uploaded for the period July 2025 onwards. There is a technical error on the system respondent. representative of the Complainant Mr. Dipak visited on 24.11.2025 and 26.11.2025 along with the full details to the office of the respondents and on 26.11.2025, he also met CA and technical staff , who assured that the data will be uploaded but till date the data was not uploaded, the respondents are trying to mislead this Hon'ble Commission and avoiding making the slab benefit and thus disobeying the order passed by the Hon'ble CGRF and trying to shift the burden upon the Complainant. In the Complainant the Complainant has raised three issues i.e. slab benefit, 4% rebate and interest on ACD. Copies of the various emails are enclosed.

4.3 That the contents of the para no.3 of the reply filed by the respondents are not disputed.

4.4 That with respect to the contents of the para no.4 of the reply filed by the respondents it is submitted that the Complainant is billing as per the tariff provision and try to upload the complete data in to the system as explained in para no.2 of the rejoinder, which may be read as part of this reply. It is the duty of the respondents to develop a system/software which is consumer friendly and without any problem the data could be uploaded or the concerned SDO should depute some technical expert in to office of the complainant to avoid any controversy. The counsel for the complainant has sent the complete

data to the SDO through email on 11.11.2025 along with the complete data with the request to upload the data as the consumer is unable to upload or help the complainant.

- 4.5 That with respect to the contents of the para no.5 of the reply filed by the respondents it is submitted that the Complainant has submitted the undertaking with the respondent which is already on record as Annexure 8 (Colly) and regarding the unified billing system the Complainant has already explained in para no.2 . The respondents and Complainant both are bound by the tariff provision and the respondents are under the obligation to allow the slab benefit as per the tariff provision.
- 4.6 That with respect to the contents para no.6 of reply filed by the respondents it is submitted that despite the mandate given by this Hon'ble Commission to raise the bill as per the unified billing system but only few society are able to raise the bills under the unified billing system and maximum societies are unable to implement the unified billing, which shows that there is a fault in the system of the respondent and their software is not upto the mark and instead of developing the proper software and helping the societies to implement in the proper manner trying to shift the burden on the consumers.
- 4.7 That the contents of the para no.7 of the reply filed by the respondents are totally wrong and denied. it is submitted that the respondents never intended to comply with the decision of the order passed by the CGRF and due to this reason the respondents never replied the various emails sent by the complainant. Now when the counsel sent a email to the respondents along with the complete data, the respondent starting making the allegation that the complainant is using the wrong ID to login in, whereas the Complainant was using the correct ID and login in the system but unable to uploaded the data due to the system failure. It is further submitted when the representative of the complainant approached the respondents in their office with the request to upload the date and thereafter the respondents technical staff also tried to upload the data but could not upload the data for which the complainant is not responsible.
- 4.8 That the contents of the para no.9 of the reply filed by the respondents are totally wrong and denied. It is submitted that the complainant has already submitted that the undertaking to the respondent, copy of which is already on record and copy of which was supplied to the respondent in their office, otherwise also the copy of the undertaking was supplied along with the complaint to the respondents and the same may be considered. It is submitted that the respondents are not replying to various email sent by the complainant and not helped to upload the data just to avoid in making the payment.
- 4.9 That the contents para no. 10 of reply filed by the respondents are totally wrong and denied. It is denied that the delay attributed to the Complainant.

Last para of the reply is prayer clause which is wrong and denied, It is, therefore, prayed that action may kindly be taken against all the

respondents for non compliance of the order passed by the Hon'ble Forum.

5. The case was heard on 03/12/2025, Ms. Suman Kashyap, SDO submitted that the refunds admissible to the petitioner as per CGRF order are payable subject to billing through UBS portal by the petitioner. Sh.B.P.Aggarwal counsel for the petitioner submitted that they have tried to upload the data on UBS portal but to no success and ultimately the data was sent to concerned SDO for uploading the same on portal. Sh. Lovepreet Singh counsel for the respondent submitted that the data provided by the petitioner was not correct as same mobile number and email ID has been mentioned on account of different residents. In the absence of correct contact details the bills will not be delivered to residents. After hearing the parties, the Commission adjourns the matter and directs the parties to resolve the issues of data by 05/12/2025. The respondent is directed to intimate the final amounts to be refunded against each direction of the CGRF to the petitioner. The respondent to process the refund within one week after billing through UBS portal with intimation to the Commission. The Concerned CA to remain present in the court on next date of hearing along with case details.

6. Compliance Report submitted on 03/04/2026:

- 6.1 The present compliance report is being filed on behalf of the Respondent through Amit Kamboj working as Executive Engineer, Manesar, Dakshin Haryana Bijli Vitran Nigam, (hereinafter referred to as DHBVN'), who is competent to file the present compliance report and is also fully conversant with the facts and circumstances of the case on the basis of knowledge derived from the record.
- 6.2 The present petition has been filed under Section 142, 146 and 149 of the Electricity Act, 2003 alleging violation of the order dated 1 1.03.2025 passed by CGRF, Gurugram and seeking consequent directions.
- 6.3 That vide the Interim Order dated 03.12.2025, the Hon'ble Commission directed as under:
- 6.4 *“directs the parties to resolve the issues of data by 05/12/2025. The respondent is directed to intimate the final amounts to be refunded against each direction of the CGRF to the petitioner. The respondent to process the refund within one week after billing through UBS portal with intimation to the Commission”*
- 6.5 That pursuant to the aforesaid directions, the Respondent has duly implemented the directions pertaining to grant of slab benefit and applicable rebate, as directed by the Ld. CGRF. Upon the Petitioner complying with the requirement of implementation of the Unified Billing Software (UBS), the Respondent has issued the refund to the

Petitioner. An amount of Rs. 1,80,52,040/- stands duly refunded and is reflected in the electricity bill for the month of March, 2026, A copy of the electricity bill for the month of March, 2026 is annexed.

- 6.6 That it is respectfully submitted that any delay, if alleged, is not attributable to the Respondents, as the CGRF Order was conditional upon the Petitioner/builder first submitting the requisite undertaking and implementing the Unified Billing Software (UBS). Only upon such compliance could the refund be processed by the Respondents.. Accordingly, the delay, if any, arose solely due to the Petitioner's noncompliance and was beyond the control of the Respondents.
- 6.7 In view of the foregoing, the Respondent respectfully prays that this Hon'ble Commission may kindly be pleased to —
- i. Take on record the present Compliance Report along with Annexure R-3; and
 - ii. Pass any other order (s) as may be deemed fit and proper in the interest of justice.

Commission's Order:

1. The case was heard on 07/04/2026, At the outset, Ms. Aerika Singh submitted that the order has been complied with and compliance report already stands submitted.
2. Sh. B.P.Aggarwal Counsel for the petitioner conveyed his satisfaction to the compliance report.
3. The Commission examined the petition in detail along with the reply, additional submissions and rejoinder on record and heard the arguments of the Petitioner and Respondents in the above matter. The primary issue crops from the respondent's failure to comply with the CGRF order dated 11/03/2025. The petitioner, sought the intervention of the Commission under Sections 142, 146, and 149 of the Electricity Act, 2003, arguing that the respondent's non-compliance constituted a wilful contravention of the law and HERC regulations. The grievances centered on failure to adjust admitted amounts related to slab benefits, interest on security deposits, and a specific 4% rebate.
4. The first issue concerns the entitlement and implementation of slab benefits for the residential units from the date of connection, August 18, 2018. The respondent eventually admitted slab benefit for the period of 17/08/20218, to 01/10/2024, subject to the implementation of Unified Billing Software (UBS) and the submission of a formal undertaking. In response, the complainant's rejoinder submitted that they had made significant efforts to comply, including uploading data for May and June 2025, but were hindered by technical failures.

5. The second issue involves the interest on the security deposit (ACD). The complainant invoked Section 154(4) of the Electricity Act, 2003, and Clauses 5.8.1 and 5.8.2 of HERC Regulation No. 34/2016, which mandate that interest at the bank rate must be adjusted in the first billing cycle of the ensuing financial year and failure to do so attracts a penal interest rate of 18%. The respondent's initial calculation for interest during the FY 2022-23 and 2023-24 was Rs. 4,72,817/- with a promise to calculate previous periods once historical ledger data was retrieved.
6. The third issue pertains to the 4% rebate withheld for the pandemic period of April 2020 to October 2020. The complainant submitted a right to this refund under Section 61(6) of the Electricity Act, 2003. The respondents, while not disputing the entitlement, maintained that the delay in processing all these refunds—including the 4% rebate—was not "deliberate or wilful" but was procedurally stalled by the petitioner's failure to finalize the UBS data integration.
7. During the hearing on 03/12/2025, the Commission addressed the technical impasse, and directed both parties to resolve these data issues by 05/12/2025, and mandated the respondent to process the refunds within one week of the data being successfully integrated into the UBS portal.
8. The final compliance report submitted on 03/04/2026, reveals that the respondent has successfully implemented the CGRF's directions. A total amount of Rs. 1,80,52,040/- was refunded and reflected in the complainant's electricity bill for March 2026. While the petitioner sought penalties under Sections 142 and 146 for non-compliance, the evidence suggests the delay was primarily a result of technical and procedural hurdles related to the mandatory transition to the Unified Billing System rather than a disregard for the law. The grievance has been redressed through the substantial refund of over Rs. 1.8 crore, and since the primary directions of the CGRF have been satisfied following the resolution of data discrepancies, the petition for punitive action against the respondents entails to be disposed of without the imposition of additional penalties.

This order is signed, dated and issued by the Haryana Electricity Regulatory Commission on 17/04/2026.

Date: 17/04/2026	Sd/- (Shiv Kumar)	Sd/- (Mukesh Garg)	Sd/- (Nand Lal Sharma)
Place: Panchkula	Member	Member	Chairman