



BEFORE THE ELECTRICITY OMBUDSMAN, HARYANA

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(Regd. Post)

Appeal No. : 37 of 2025
Registered on : 13.08.2025
Date of Order : 22.01.2026

In the matter of:

Appeal against the order dated 18.07.2025 passed by CGRF, DHBVN Gurugram in case No 4873 of 2025 - Shri Subodh Grover

Shri Subodh Grover, R/o H-1904, Princess Park, Sector-86, Faridabad – **Appellant**
121002, Haryana
Versus

1. XEN /OP Divn, DHBVN, Greater Faridabad
2. SDO (OP), Kheri Kalan, DHBVN, Faridabad

Respondent

Before:

Shri Rakesh Kumar Khanna, Electricity Ombudsman

Present on behalf of Appellant:

None

Present on behalf of Respondents:

Shri Raghav Kakkar, Advocate
Shri Shivpartap, Advocate
Shri Sunil Chawla, SDO
Shri Vinod Chhawri, PPRWA President
Shri Anup Mehta, PARWA, General Secretary
Shri Ramnik Chahal, PPRWA

ORDER

- A.** Shri Subodh Grover, R/o H-1904, Princess Park, Sector-86, Faridabad – 121002, Haryana has filed an appeal against the order dated 18.07.2025 passed by CGRF, DHBVNL, Gurugram in case No. 4873 of 2025. The appellant has submitted as under: --

This appeal is being preferred under rules & Regulation of the HERC (Forum and Electricity Ombudsman) Regulations read with the provisions of Electricity Act, against the Final Order dated 18.07.2025 passed by the Corporate Forum for Redressal of Consumer Grievances (CGRF), DHBVN, Gurugram in Case No. DH/CGRF/4873/2025.

It is submitted that I have not filed any other proceedings before any other court in respect of the same subject cited matter and no other proceedings pending before any other court in respect of the same subject matter. Any fees for filling appeal, humble request to waive off or will be paid as directed.

It is respectfully submitted, that order passed by Hon'ble CGRF, Gurugram is erroneous, incomplete, and violative of the principles of natural justice and the statutory obligations under the HERC Regulations.

1. Brief Background and Grounds of Appeal

I, the Appellant, filed a detailed complaint before CGRF, (Corporate) DHBVN, Gurugram seeking redressal of serious irregularities in the electricity billing mechanism being followed by the Princess Park Residents Welfare Association

(PPRWA), despite the Single Point Connection (SPC) in the name of the erstwhile builder, M/s Countrywide Promoters (now BPTP Ltd). My prayers included:

- Implementation of Unified Billing System (UBS) and issuance of electricity bills to the residents of society / individual consumers in conformity with HERC rules, guidelines and Sales Circulars as per approved format.
- Audit and to get investigation conducted by Vigilance wing or Economic offence wing or etc of all bills issued to individual residents & shops of society relating to sub meters , vis-à-vis the DHBVN's SPC billing in last five years in time bound manner with regard to electricity bill generation and as issued to the residents and billing units thereof, common area electricity billing units , common area bill charging methodology from the residents including the amount collected from the each resident/s and other issues raised by the resident/s in relation to electricity including DG power back generation units and billing related.
- Assessment of meters functionality, DG billing, defective meters, and charges levied by PPRWA.
- Grant of rebates/subsidies as applicable to domestic consumers.
- Other electricity issues per prayer in the complaint made to CGRF, Gurugram

2. Procedural Irregularities and Denial of Fair Hearing

While the Forum held multiple hearings and issued directions, it failed to ensure basic procedural fairness, as highlighted below:

(a) RWA Filed Reply Without Serving Copy to Appellant

- During the final hearing, RWA reportedly filed a reply; however, no copy was ever shared with the Appellant, nor is it acknowledged or reproduced in the CGRF Order.
- This is a clear denial of the right to rebut and undermines the adversarial process mandated under natural justice.

(b) Builder BPTP Never Appeared Despite Directions

- Although the Forum directed SDO to ensure participation of the builder (M/s BPTP Ltd.), the builder never appeared or submitted any response, and no adverse inference was drawn against them.

(c) Failure of SDO to Comply with Directions

- The SDO failed to comply with CGRF's interim order/s to inform and involve the Appellant during the site visit (if any). This non-compliance was even brought to the notice of the Chairperson, but was ignored.

3. Substantive Issues Ignored in Final Order

The Final Order dated 18.07.2025 merely reiterates previously known facts and casually directs the SDO to "visit the society" and ensure compliance by the RWA — without providing:

- Any binding time-bound direction;
- No direction for meter audits or investigations despite as annexure to the complaint annexed some copies of hand-written meter readings taken by the RWA authorized person relating to the society, subsidy pass-through, or transparent billing;

- No comment on earlier vigilance complaints, which had been forwarded to DHBVN HQ by the Directorate of Vigilance.
- No findings for transfer of SPC to RWA despite builder having handed over the society;
- The Order amounts to merely disposing the matter perfunctorily without addressing any of the specific reliefs sought in time bound manner.

4. Prayers

In view of the above, the Appellant humbly prays that this Hon'ble Ombudsman may be pleased to:

1. Set aside the impugned Final Order dated 18.07.2025 passed by CGRF in Complaint No. 4873/2025;
2. Direct DHBVN to enforce implementation of the Unified Billing System as per HERC rules - regulations and approved tariff and format in specified time bound manner;
3. Order a time-bound technical, financial audit or investigations including from economic offence wing / vigilance or third party etc. of all the individual and common area meters and bills raised by the RWA vis-à-vis bills raised by DHBVN under the SPC including related to DG power (power back up) of around last 5 years;
4. Ensure pass-through of all subsidies, rebates, and incentives to end-users as applicable to domestic consumers;
5. Take appropriate action against the SDO and other officials for non-compliance of CGRF directives;
6. Pass any other relief as may be deemed just and proper in the facts and circumstances of the case.

B. The appeal was registered on 13.08.2025 as an appeal No. 37 of 2025 and accordingly, notice of motion to the Appellant and the Respondents was issued for hearing the matter on 04.09.2025.

C. Vide email dated 20.08.2025, appellant has requested as under: -

A) to also issue notice of motion of appeal to Princess Park Resident Welfare Association (e mail address: parkprincessrwa@gmail.com), as for the last 5 years approx. issuing and collecting the electricity bills from the residents.

B) to also issue notice of motion of appeal to Country Wide Promoters / BPTP, as main electricity connection no. 363658000 and bill of DHBVN issued to Country Wide Promoters / BPTP.

Its pertinent to mention that vide Annexure 1 before CGRF, Gurugram in case no. 4873 GGN / 2025 dt. 21 April ,2025 these above two namely Princess Park Resident Welfare Association {e mail address: parkprincessrwa@gmail.com} and Country Wide Promoters / BPTP were also made parties.

D. Hearing was held on 04.09.2025 as scheduled. All parties were present except M/s Countrywide Promoters Princess through Video Conference. During hearing, SDO respondent and respondent counsel requested for two weeks time for filing the reply.

Appellant is also directed to file the rejoinder within one week thereafter, if any. Representative of Princess Park Residents Welfare Association sought copy of the complaint for which the SDO respondent was directed to send the copy of the complaint to Princess Park Residents Welfare Association. SDO respondents is also directed to incorporate status of implementation of unified billing as per sales circular no. D-23/2022 in his reply.

The case is adjourned and now will be heard on 29.09.2025.

E. On 26.09.2025, counsel of respondent has submitted reply which is as under: -

1. That, the present Reply is being filed by Executive Engineer Operation, Dakshin Haryana Bijli Vitran Nigam, Greater Faridabad (the “Respondent No. 1”), and the SDO Operation, DHBVN, Kheri kalan, DHBVN, Faridabad (the “Respondent No. 2”), having office at City Division, DHBVN, Mehrauli, Gurugram Road, Gurugram-122001 (collectively the “Respondents”) to the Appeal filled before the Electricity Ombudsman Haryana bearing Appeal No. 37/2025 (the “Appeal”).
2. That, it is most respectfully submitted that no averments, statements, submissions, grounds, contentions, or allegations made by the Appellant in the Appeal shall be admitted or deemed to be admitted for reason of non-traverse or otherwise save and except these are expressly admitted herein.
3. That, it is respectfully submitted that the present Appeal cannot be allowed in favor of the Appellant hereto (reasons for which are explained in detail hereunder) as the Appeal in itself, is devoid of any substance and merit and is made with the mala-fide intention to mislead, misguide and misrepresent this Hon’ble Ombudsman.
4. That, the Appellant is resident of House No. 1904, Princess Park, BPTP, Sector 86, Faridabad which is developed and completely managed by Princess Park Residents Welfare Association (the “RWA”) and M/s Country Wide Promoters/(BPTP) (the “Builder”). The present matter pertains to the wrongful billing by the RWA to the Appellant/Complainant. The Appellant in the Complaint form dated April 21, 2025, filed before the CGRF bearing no. 4873/2025 has expressly mentioned that the grievance in the present matter lies against the RWA who has issued the electricity bill to the Appellant in the present matter. The Appellant in the present matter has raised specific grievance of incorrect/wrong billing by the RWA in connivance with the Builder. The extract of the Complaint raised by the Appellant is reproduced hereunder for ready reference:

“Since last more than three (3) years, the handover of maintenance of the society has been done from builder (MS Country Wide) and its maintenance agency (BPMS) to the Princess Park Residents Welfare Association (PPRWA), the Registration no. of PPRWA is HR019/2013/00251 Since the maintenance handover the installation of electricity meters, locked under electricity shafts, possession and control of each and every meter. reading of consumed units, issuing /generating bills, collecting electricity bills etc. of all the residents of the society are being done solely by Princess Park Residents Welfare Association (PPRWA)”

Form the bare perusal of the aforementioned Complaint raised by the Appellant it is evident that there is no grievance against the Respondents in the present matter. Therefore, the Appeal is liable to be dismissed on the ground of absence of cause of action against the Respondents.

5. That, the aforementioned complaint was disposed off on July 18, 2025 on the ground that Unified Billing has to be implemented by the Builder/RWA and the Respondent was directed to give direction to the Builder/RWA to implement the Unified Billing System and prepare a report in case of non-compliance. The relevant extract of the Order dated July 18, 2025 is reproduced hereunder for ready reference:

“After considering the reply of both the complainant and SDO and submissions made by them in the hearing, the Forum directs the SDO (OP) to visit the society and give direction to the Builder/RWA in the presence of complainant for following issues and ensure the billing may be done as per HERC regulation: -

- 1 *Implementation status of Unified billing.*
- 2 *Status of Common Area Maintenance charges & status of meter installed in Common area.*
- 3 *Status of installation of pre-paid meter as per SC D-17/2020.*
- 4 *Charging done as per DHBVN tariff or not. If not done then submit detailed report.”*

A copy of the Order dated July 18, 2025 passed by the Consumer Grievance Redressal Forum is annexed hereto and marked as Annexure R-1.

Further, the Respondents in compliance of the impugned CGRF Order have prepared a detailed report for non-compliance on part of the Builder/RWA in implementing the Unified Billing System. The relevant extract of the compliance report is reproduced hereunder for ready reference:

“1. Implementation status of Unified billing: Further it is submitted that Office of Sub-Division Kheri Kalan gives multiple notices to the Builder/RWA for implementation of Unified Billing Software (UBS). So that billing will be done as per HERC tariff rate (Copy of notices are attached for your reference please) but the Builder/RWA is failed to implement the same.

2. Status of Common Area Maintenance charges & status of meter installed in common area: As per the discussion held with RWA, they are charging the common area maintenance charges through Post Paid meters and there is a separate column for common area electricity charges is mentioned in the bill distributed by the RWA to residents of the society (copy of sample bill is attached for your reference please). Further it is submitted that there is separate meter installed for common area.

3. Status of installation of pre-paid meter as per SC D-2020 As per the discussion held with RWA, they are charging electricity bills from the residents through individual Post-paid meters.

4. Charging done as per DHBVN tariff or not. If not done then submit detail report as per the record available in this office, being a single point connection there is single bill is generated by this office and internal billing is to be done by the builder/RWA itself. Further it is submitted that this office gives multiple notices to the Builder/RWA for implementation of UBS. So that billing will be done as per HERC tariff rate but the Builder/RWA is failed to implement the same.

The above facts are submitted for your kind consideration and further necessary action please.”

A copy of the Report is annexed hereto and marked as Annexure R-2.

THE RESPONDENTS HAVE TAKEN COGNIZANCE OF THE NON-COMPLIANCE BY THE BUILDER OF UNIFIED BILLING SYSTEM

6. That, the Respondents have already sent a multiple reminders to the Builder/RWA letter dated February 10, 2025, December 23, 2022, September 06, 2024 to M/s Country Wide for Implementation of Unified Billing System. The extract of the reminder dated February 10, 2025 is reproduced hereunder:

“Subject: UNIFIED BILLING SOFTWARE FACILITY FOR MANAGING BILLING ACTIVITIES BY THE BUILDER/DEVELOPER/COLONIZER/USERS ASSOCIATIONS INSIDE THE PREMISE OF THEIR SINGLE POINT SUPPLY

Dear Sir/Madam,

- 1. Please refer to the following:-*

- (a) HERC Order dated 09 Oct 2020 available at <https://herc.gov.in/WriteReadData/Orders/O20201009.pdf>*
- (b) DHBVN Sales Circular No. D-23/2022 available at https://dhbvn.org.in/staticContent/saleregulation/salecircular/circular2022/SC_D-23-2022.pdf*

- 2. In this connection, it is intimated that with immediate effect the "Unified Billing Software" is to be implemented inside the premise of GHS/Builders/Colonizer/RWA having Single Point Supply in accordance with the Sales Circular and HERC Order mentioned ibid. The "Unified Billing Software" is a web-based portal which can be access through <https://misweb.dhbvn.org.in/billingsystem/login.aspx>. The user login credentials will be shared via digital medium.*
- 3. The regular monthly electricity bill to the individual consumers residing in the society/colony/complex will be on the format approved by the commission. The resident / users will be charged for their consumption as per tariff approved by the commission for respective category of consumers i.e. DS/NDS.*
- 4. In order to ensure and achieve 100% implementation of "Unified Billing Software", you are requested to scan QR Code enclosed herewith to join a whats app group created to facilitated technical assistance and resolve queries. Also, an online training regarding usage and functioning of "Unified Billing Software" will be conducted by the below mentioned officials through digital platform google meet/Zoom meeting. The details of the training session would be shared on above mentioned whats app group. For any assistance you may contact the below mentioned officials.*
- (a) Sh. Pankaj Kumar, JSE (Mob-9034888979)*
 - (b) Sh. Irshad, JSE (Mob-9034888978)*
 - (c) Sh. Parkash Dubey (Sub Division Kheri Kalan, Mob - 8588036083)*
- 5. It is further added that after completion of successful training it is mandatory to upload society consumers database on UBS portal in the predefined formats by respective GHS/RWA's within stipulated period.*
- 6. The Employer/GHS/Developer/User Association to install energy meters as per the Standard Specifications and duly tested/ sealed from DHBVN's Test Lab/ Accredited Test Laboratory for all the common facilities/ services, residents and other NDS/other loads etc. in the Colony/GHS/Complex for measuring electricity at your own cost.*
- 7 In view of the above, you are requested to do the needful in compliance of the above referred directions please”*

7. Further, as per Sales Circular No. D- 23/2022 issued by the Respondents wherein guidelines were issued, which were to be complied by Employer / GHS / Developer/ Users Association for initiating Unified Billing Software facility for managing billing activities inside the premise of their Single Point Supply. The Respondents through the said Sales Circular through guideline no. IX to XII made it expressly clear that the Employer / GHS / Developer/ Users Association shall be responsible for all liabilities & obligations including individual metering, billing, and collection of charges from individual users and payment of energy bill for Single Point Supply to the DHBVN.

A copy of the Sales Circular No. D- 23/2022 is annexed hereto and marked as Annexure R-3.

THE PRESENT APPEAL IS LIABLE TO BE DISMISSED AS THE APPELLANT HAS FAILED TO MAKE THE BUILDER A PARTY AND IN THE ABSENCE OF THE NECESSARY PARTY NO EFFECTIVE ORDER CAN BE PASSED

8. That, the Appellant is abusing the process of law by unnecessary impleading the Respondents as a party to the complaint. The Appellant in the Complaint form filed before the CGRF bearing no. 4873/2025 has clearly mentioned that the grievance in the present matter lies against the Builder/RWA who is a private third party in the present matter and not against the Respondents.
9. That, Appellant despite being fully aware that his grievance lies against the Builder/RWA has failed to make the Builder/RWA necessary party to the Appeal. In the absence of the Builder/RWA no effective order can be passed by this Hon'ble Commission, since the impugned bills that have been challenged by the Appellant in the present Appeal have been generated by the RWA. A copy of the Bill raised by the Builder/RWA dated May 20, 2023 is annexed hereto and marked as Annexure R-4.
10. From bare perusal of the aforementioned bill it is evident that there is no cause of action against the Respondents and the actual grievance lies against the Builder/RWA who has not been impleaded as a party to the Appeal.
11. That, this Hon'ble Commission in the matter of *Sandeep Fogaat vs Jagdeep Kumar & Ors.* bearing Case no. HERC/P.No. 39 of 2024 has held that the DHBVN fulfilled its role by issuing directives to the builder and had directed the Builder to comply with the directives of the DHBVN and to take affidavit from the Builder to delink Common area maintenance and Common area Electricity charges from the smart meter. The relevant extract of the Order dated December 12, 2024 is reproduced hereunder:

"3.2 It is utmost relevant to mention that the present petition is not maintainable qua DHBVN, as DHBVN is not in violation of the order dated 12.04.2024 passed by the Consumer Grievance Redressal Forum ("CGRF Order") and has in fact duly complied with the directions issued by CGRF..."

DHBVN: Claimed compliance by issuing multiple directives to the RWA to delink charges and adopt unified billing. Cited procedural challenges in enforcement, as the RWA manages internal distribution..."

DHBVN in their reply submitted that the directions imparted to DHBVN by the CGRF have been complied and the RWA has been instructed to stop charging of CAM & CAE through prepaid electricity meters and issue electricity bills through unified billing system. The Commission observes DHBVN fulfilled its role by issuing directives but should have followed up more rigorously to ensure full enforcement.”

A copy of the Order dated December 12, 2024 passed by this Hon'ble Commission is annexed hereto and marked as Annexure R-5.

12. However, in the present case, the Respondents have already fulfilled its roles by issuing directions to the Builder/Developer for Implementation of Unified Billing System, so that no unnecessary hardship is caused to the residents/consumers. Further, the Respondents has also issued a Sales Circular No. D-23/2022, wherein guidelines were issued *vide* letter dated August 30, 2022, which were to be complied with Employer / GHS / Developer/ Users Association for initiating Unified Billing Software facility for managing billing activities inside the premise of their Single Point Supply.
13. That, the Respondents have already sent a Notice to the Builder for Implementation of Unified Billing system whereby the Respondents introduced standard billing formats so that no unnecessary hardship is caused to the residents/consumers.
14. Therefore, it is humbly prayed before this Hon'ble Commission that the present Appeal may kindly be dismissed as the Respondents have already fulfilled its role effectively. Moreover, in the absence of necessary party i.e. the Builder/RWA., no effective order can be passed as the grievance in the present matter lies against the Princess Park Residents Welfare Association and M/s Country Wide.

- F.** On 27.09.2025, Princess Park Resident Welfare Association (RWA) has submitted reply.
- G.** Hearing was held on 29.09.2025, as scheduled. All parties were present except M/s Countrywide Promoters Princess through Video Conference. During hearing, it was observed with a serious note that the respondent SDO has tried to shun his responsibility by simply saying that he has taken correspondence with the RWA as per sales circular no. D-23/2020 where as he was silent when it was inquired about the action taken on the five number letters and nine number emails made by the RWA to sort out the issues relating to their unified billing.

In order to sort out and have transparent accounting of units the respondent SDO, RWA and the appellant Sh. Subodh Grover have been asked to have meeting in the chamber of respondent SDO on October 1, 2025 at 11:00 hours.

Accordingly, the respondent SDO and RWA are hereby directed to undertake the following activities after the meeting on October 1, 2025: -

- (a) The audit of the energy account for The Princess Park Residents Welfare Association be undertaken within 3 weeks time from the Chief Audit wing of DHBVN for transparency as per clause no. XVIII of the sale circular no. D-23/2022.
- (b) The respondent RWA will also get the audit of the billing activities performed in compliance to clause no. XIX and XX of the sales circular no. D-23/2022.
- (c) Upon successful of the billing activities the honorarium shall be paid by DHBVN as per clause no. XXII of the sales circular no. D-23/2022.

The respondents are directed to get the complete activities done within a time period of 30 days from the date of issue of this order and supply the copy of the audit reports to the appellant and to this forum for maintaining transparency and dispose of the present appeal.

The case is adjourned and now will be heard on 03.11.2025.

H. On 30.10.2025, appellant has submitted rejoinder on the reply filed by SDO in appeal no. 37 of 2025 which is as under:

1. That preliminary objections being wrong and denied. Some objections to the extent are matter of record and mostly are wrong and denied. It appears that as an eye wash initially just for 2 months unified billing started then when resident/s raised queries abruptly stopped may be to avoid explanation to the various representations of the appellant including to MD DHBVN and Director Vigilance, Haryana Power Utilities and other authorities etc.
That it can be easily ascertained no such serious efforts or attempts made for following the rules and regulations of HERC for billing activities related including implementing Unified billing as per HERC rules. Its matter of record if at all matter even ever escalated to senior officials of DHBVN for getting the shortcomings removed (if any) and resolution.
Further it can also be well ascertained that no such details etc provided during the CGRF hearing / or in reply.
2. That Princess Park RWA has not given the correct facts which are even well documented Seems simply trying to undue influence and misled the Hon'ble Ombudsman by concealment of material facts in the matter and with malicious intentions.
3. That the RWA / respondent deliberately did not reply to main issues raised before CGRF, Hon'ble Ombudsman and time to time various representations made including to MD, DHBVN and Director Vigilance, Haryana Power Utilities and other authorities etc including representations addressing to RWA.
4. That regarding electricity issues including billing related many emails dated 17/2/23, 5/3/23, 19/3/23, 5/4/23, 17/5/23, 30/5/23, 28/6/24 etc written and addressed to Princess Park RWA also. Some of the emails with annexure are attached with of CGRF complaint and part to this appeal also.
5. That in its reply, RWA has falsely and wrongly stated that due to the personal animosity, the appellant has filed the appeal to get unified billing as per the rules and regulations of HERC and also to remove other irregularities and to stop exploitation at large including to maintain transparency.

6. That it's a matter of record, earlier also time to time other residents had raised the various issues including of electricity issues. (A Copy of representation dt 10/7/2020 is attached as ready reference 0).
It's also to state on record, in past also on representations of some residents and myself, earlier electricity billing issuing and collecting agency of builder i.e. BPMS duly admitted fault in meters and extended credit to the bill residents.
7. That it's wrong and false allegation that I have ever obstructed to replacement of defective meter. It's a half-cooked story just to unduly influence and misled the Hon'ble Ombudsman. Meter was not defective at all. Please refer to my email dt 17/5/2023 in reply to email dt 12.5.23 of RWA. (copy of my reply email dt 17/5/23 attached for ready reference).
8. That in its reply, RWA again wrongly with malicious intentions mentioned that i have resigned from Vice President of RWA. Its totally false and wrong as stated in the reply by RWA. As documentary proof, please refer to letter no. DIC/DR/ FBD/1990 dt 4/12/2020 of District Registrar Firms and Societies, Faridabad clearly indicating that Vice President has not resigned of Governing Body of Princess Park and on representation of myself other residents self-imposed RWA elections were rejected. (Copy of letter no. DIC/DR/ FBD/1990 dt 4/12/2020 of District Registrar Firms and Societies, Faridabad attached as ready reference).
9. That many members of then RWA resigned in protest as result of assault / beating of then General Secretary Mr. Rishi Sood by the present Vice President Mr. Ranmik Chahal. The copy of complaint filed by Mr. Rishi Sood is attached. The e -mails copy of resignations of some board members clearly indicating the criminal activity concern also attached here with for reference.
10. That of late some members of present RWA including present Vice President Mr. Ranmik Chahal has assaulted myself. The copy of police complaint in this regard and then Personal Muchalka of Rs 50000/ as tendered by Mr. Ranmik Chahal before DCP Cum Executive Magistrate, Central Faridabad is attached for ready reference.
11. That related to society incident police has recently filed a FIR no.0286 dt 8/9/2025 against several accused including Mr. Ranmeek Chahal (Present Vice President of RWA). The copy of FIR also attached for ready reference. Its clear indications of even involvement in criminal activities also.
12. That from the attached complaints of residents, it can be ascertained that time to time under mutual connivance and consent RWA / respondent also involved in unlawful activities including of criminal nature with other residents also.
13. That it is stated, the conduct of the RWA / respondent in knowingly and deliberately making false statements before the Hon'ble Ombudsman makes them liable to be prosecuted under the laws.
14. In fact, RWA / respondent continued with their threats and unlawful activities in connivance of each other. The concealment of facts, making false and cooked up averments to mislead the Hon'ble Ombudsman, is liable to be criminally prosecuted.
15. That no details of defective meters installation place, name of unit holder including duration of defect thereof and resultant effect on the other bills

provided as mentioned in the reply. Though its clearly admitted in reply about defective meters. No transparency or rules and regulations followed about it.

16. During CGRF hearing also it was mentioned that all the register entry records of meter readings relates to the Princess Park society only and the meter readings registers are in the possession of RWA. The same can be ascertained and provided once RWA provides the meter readings register/s readings of meters are physically taken and written the registers by the maintenance person working under RWA.
17. That time to time many other residents of society also raised the electricity related issues.
18. That respondents seems also have monetary yield behind the concealment of facts and submission of even well documented facts.
19. That till date, CGRF order (final and interim) not implemented by officials of DHBVN and Princess Park RWA.
20. That In total disregard and disrespect to applicable rules, regulations and various authorities, even till date residents of society including myself not issued and charged electricity bill as per unified Billing per HERC rules, regulations and approved format.

I. On 03.11.2025, Princess Park RWA has submitted data pertaining to electricity billing. Meeting of SDO office on 01.10.2025 and subsequent communication after that:-

We from Princess Park RWA would like to inform

1. that data pertaining to electricity billing is ready with us and we are submitted it to SDO in the form of a pen drive.
2. This data is of last 4 years (from sept. 2021 to till date) Data prior to this period is with our builder BPTP/BPMS. We as RWA took handover of maintenance services on 21.08.2021 and we are submitting data after this.
3. Regarding unified billing system, we would like to submit that as per CGRF order, we have placed orders for new prepaid meters for whole society. The vendor will install these meters within 3 months.

The implementation US, initial data of each metering unit is to be fed into portal. After that UBS can be started. So, we request you to grant a period of 3 months so that new meters can be installed and initial data can be uploaded on UBS porta.

4. We also want to inform that every year, our electricity billing audit is done by 3rd party CA firm. This is shown and presented in Annual General meeting every year.

J. Hearing was held on 03.11.2025, as scheduled. All parties were physically present. During hearing, Shri Vinod Chhawri (President) and Shri Anup Mehta (General Secretary) for Princess Park (RWA) submitted the data pertaining to the electricity billing (in pen drive) for Audit. Furthermore, they informed that the present data relates to the last four years i.e. from September 2021 to till date. The data prior to the above period is available with builder BPTP/BPMS as the maintenance services were handed over to RWA on 21st August 2021. They further submitted their

concerns regarding the implementation of unified billing software and intimated that they have placed order for the new meter.

The record in the shape of pen drive submitted by the representative of the RWA was taken on record and their excuse regarding non-implementation of unified billing software in their Princess Park Society was not found acceptable as a period of more than 3 years have lapsed since the issuance of sales circular no. D-23/2022 dated 30.08.2022. Furthermore, respondent SDO Shri Sunil Kumar Chawla, SDO informed that in compliance to the earlier order dated 29.09.2025 a meeting was held in his office between the complainant/RWA and SDO/Operation Kheri Kalan on dated 01.10.2025 but the data for the audit has not been provided to him by the RWA in spite of three numbers written communication. This has been viewed seriously by the Electricity Ombudsman. Since the interim order passed on dated 29.09.2025 has not been complied with by the respondent parties and Shri Hemant Saini counsel of BPTP, Countrywide Promoters informed that he has yesterday itself has received the copy of the complaint in the ibid matter. In order to get the interim order dated 29.09.2025 implemented in its true spirit and to enable implementation of unified billing software in the Princess Park Society as per sales circular no. D-23/2022 dated 30.08.2022 of DHBVNL the responsibility of various parties have been assigned as per the provisions of the said sales circular as mentioned herein under:-

Sr. No.	Name of the parties	Relevant provision to be complied as per the provision of the sales circular no. D-23/2022 dated 30.08.2022 of DHBVNL	Additional observation made in the matter
1	Respondent (DHBVN)	Sub para- XIII, XIV, XVII, XVIII, XIX, XXII of point no. 3	i) Reason why unified biling software could not be implemented inspite of lapse of more than 3 years. ii) What amendment or changes have been made in the unified billing software to make it implemented successfully.
2.	RWA	Para no. XII, XVI, XX of point no. 3	
3.	Developers / Builders	(para no. II, III, sub para III)	i) What actions were taken to ensure proper billing of the consumers, common area and other facilities within the society. ii) To supply the data to respondent SDO for the period as intimated by RWA representative so that proper audit could be carried out.
4.	Complainant	Sub Para no. XXI of point no. 3	He offered his voluntary service in the matter as far as the independent audit is concerned.

All the parties are further being directed to comply the above responsibility assigned without any excuse and submit their responses in the matter. The respondent SDO and

RWA representative are further directed to supply their interim reports in respect to the following activities: -

- (a) The RWA will update the data of the residents of Princess Park Society on the unified billing portal of DHBVN in case of any assistance well conversant official shall be deputed by respondent SDO for getting the done within a week i.e. 10.11.2025.
- (b) The data of four years as made available by the representative of RWA **(soft copy being attached with this interim order)** shall be used by DHBVN authorities to carry out the Audit of four years. The balance data of one year shall be made available before the auditing authority by BPTP within a time span of 10 days i.e. upto 14.11.2025.

The status report shall be submitted by respondent SDO upto 14.11.2025 duly verified in respect of both the above directions in the shape of interim reply.

- (c) The audit work in respect of the energy billing to the residents of the Princess Park Society to verify the facts that the correct billing and collection of the revenue and the proper categorization of the consumer for the correct recovery as per the scheduled of the tariff approved by HERC and circulated by DHBVN is being maintained and the billing record of all the consumers in the billing data base as per DHBVN requirement is mandated. It shall also be ensured that the billing of the individual consumers residing in the colony/complex is done by employer/GHS/Developers/Users association as per appropriate and applicable tariff being issued by DHBVN in the shape of various circular. The exercise must be completed upto 30.11.2025. The next billing shall be made through unified billing portal and it shall be the responsibility of concerns Xen/Operation and SDO/Operation to get the same implemented in letter and spirit as both have failed miserably to get the sale circular no. 23/2022 implemented.
- (d) The RWA will separately get the audit of the billing of the consumers/residents done from the independent auditors separately by involving Sh. Subodh Grover who himself volunteered for participation without any remuneration. This exercise be undertaken by the RWA upto 30.11.2025.
- (e) The request made by Shri Subodh Grover for making utmost authority of DHBVN as party in the appeal could not be considered as the case is being represented through the nominate officers of DHBVN.

The next date of hearing is 09.12.2025.

K. On 11.11.2025, Princess Park RWA has submitted application for clarification/modification in interim order dated 03.11.2025 in Appeal No. 37 of 2025 regarding audit participation of complainant which is as under:-

With due respect, we, the Princess Park Residents Welfare Association (RWA), submit that in para (d) of the interim order dated 03.11.2025, it has been directed that the RWA shall get the audit of billing of the consumers/residents done from independent auditors “by involving Shri Subodh Grover, who himself volunteered for participation without any remuneration.”

In this regard, we respectfully submit that -

1. The complainant, Shri Subodh Grover, being a party to the proceedings, has a direct personal interest in the matter, and hence his participation in the audit exercise may lead to conflict of interest and affect the independence and impartiality of the audit.
2. The audit work is purely a professional and technical exercise to be undertaken by independent qualified auditors appointed by the RWA, and no party to the appeal can legally be part of or supervise the same.
3. The RWA remains fully committed to ensuring complete transparency and shall share the audit report with all concerned, including the Hon'ble Ombudsman and DHBVN, after completion of the same.

In view of the above, it is respectfully prayed that the direction in para (d) of the interim order dated 03.11.2025 may kindly be clarified/modified to the extent that -

“The audit of billing of the consumers/residents shall be carried out by independent auditors appointed by the RWA, and the complainant shall not be associated with the audit process in any official or participatory capacity.”

- L.** Vide email dated 17.11.2025, Princess Park Residents Welfare Association has submitted as under:-

At present, the RWA and the builder are carrying out billing through another software, from which UBS billing is being generated. PPRWA has completed all the required work on this software.

Some technical issues are currently occurring on the DHBVN portal, and PPRWA is in continuous coordination with both the DHBVN team and the UBS portal team to resolve them.

PPRWA had already sent all necessary information — including consumer details and opening units — to the DHBVN and UBS portal teams via email on 10th November. Both teams are working on resolving the technical issues in the portal.

PPRWA is presently working simultaneously on both the DHBVN portal and the other software.

UBS billing is expected to be started by the RWA in December, or possibly even within this month.

- M.** Vide email dated 17.11.2025, respondent's SDO has submitted as under:-

“It is submitted that the RWA is presently unable to update the residents' data on the Unified Billing Software Portal of DHBVN due to some technical issues being faced at their end. This office has already communicated the matter through an email to the office of the SE (IT) for immediate resolution. The issue is expected to be rectified within 3-4 days.

It is further submitted that the data pertaining to four years, as provided by the RWA, has been handed over to the auditing authorities for carrying out the audit. However, the balance data of one year has not yet been provided by BPTP. The same is still awaited for submission to the auditing authority.”

N. On 27.11.2025, Princess Park Residents Welfare Association has submitted as under:-

This is to inform you that Princess Park RWA has uploaded all the required data of Princess Park Society on the UBS portal as per the formats prescribed by DHBVN.

The opening units up to 1st November have been successfully uploaded.

The billing will be prepared by including the closing units up to 30th November.

The billing for the said period will be carried out in December 2025 under Unified Billing as per the guidelines of DHBVN and HERC.

Princess Park Society is fully ready for Unified Billing.

O. Vide email dated 08.12.2025, appellant has submitted as under:-

“This is further to the Hon'ble Ombudsman order dt 3/11/2025, where in Hon'ble Ombudsman vide para (d) directed the Princess Park RWA to get the audit of bills of the residents from the independent Auditor separately by involving the complainant / Subodh Grover and exercise to be undertaken by the RWA upto 30/11/20225.

It is submitted that till date w.r.t to getting audit done, RWA has not communicated anything till date to the complainant thus again failed to comply with the orders of Hon'ble Ombudsman order dt 3/11/2025.

Also, the process of meter readings recordings and generating the bills to the residents of the society required to be clarified in clear terms.

Before CGRF, Gurgaon, as per reply filed by the RWA dt 1/7/2025 where in RWA mentioned that the meters are monitored online and daily consumption of each meter is recorded. Where upon reply filed by the RWA before the Hon'ble Ombudsman reveled that a 3rd party agency "PES " monitors all meters daily from 9 AM to 6 PM. But it has not been mentioned or clarified as the meter readings are taken manually. It is reiterated that electricity meters readings of the residents are collected and recorded in the register manually by maintenance deptt working under RWA from the electricity meters installed in shafts under locks and key of RWA and evidence of the same already with the appeal and further can also be provided including video of same.

Primary document/s on which the data based upon, the bills generated by RWA to the residents including the copy bills issued by the DHBVN, and payment receipts thereof of each month of last 5 years not provided yet including for the audit purposes related making it a dubious and sham exercise simply to cover up.

Despite clear orders for issuance of electricity bills to residents as per rules and approved formats still not been issued to the residents including myself.

Being senior retired citizen (not getting pension also), humble request to grant me permission to attend the hearing in appeal no.37 of 2025 thru VC and permit me not to attend in person.

Tomorrow i.e. 9th Dec,2025 (Tuesday), due to family social commitment also, I am taking a 87 years old close relative to Doctor for treatment / dressing of diabetic foot wounds to Delhi as doctor has given appointment for tomorrow. So grant me permission to attend the matter thru VC.

Further, its already many many years that HERC's own rules and regulations not implemented despite many representations in the matter.

Hon'ble Ombudsman is also requested to refer the matter to Vigilance dept. / other investigating agency for proper investigation for justice and transparency at large.

P. On 08.12.2025, counsel of respondent's SDO has submitted compliance report.

Q. On 08.12.2025, Princess Park Residents Welfare Association has submitted Independent Auditors report.

On behalf of Princess Park Residents Welfare Association (PPRWA), Sector-86, Faridabad, we respectfully submit herewith the Independent Auditor's Interim Report prepared by Pratibha Bhaker & Associates, Chartered Accountants, relating to:

Electricity billing practices followed by PPRWA

Period covered: September 2021 to March 2023

Pending period under audit: April 2023 to November 2025

This report has been commissioned by PPRWA to ensure full transparency, regulatory compliance, and safeguarding of consumer interests with respect to billing, categorisation, data integrity, and adherence to DHBVN/HERC tariff orders and circulars.

The statutory auditor has also requested one additional month to complete the audit for the remaining period, and the same is under progress.

The objective of submitting this interim report to the Hon'ble Commission is:

1. To place on record the findings of the independent audit.
2. To seek any guidance or direction HERC may consider appropriate in the interest of residents/consumers.
3. To demonstrate PPRWA's commitment to compliance, fairness, and accountability in all electricity billing matters.

We humbly request the Hon'ble Commission to kindly take the report on record and issue further instructions, if deemed necessary.

We remain fully committed to cooperating with the Commission and ensuring strict adherence to all regulatory provisions.

R. Hearing was held on 09.12.2025, as scheduled. Shri Hemant Saini Advocate with Shri Himanshu Monga & Neha Advocate appeared on behalf of Countrywide Promoters Pvt. Ltd. BPTP has submitted that requisite record available with them to the respondent SDO. The respondent SDO confirmed the same and accordingly the BPTP is exempted from the next date of hearing.

The compliance status in respect of the order dated 03.11.2025 was sought from the respondent SDO who has replied as under: -

1. It is intimated that the data of all the resident of Princess Park Society has been uploaded on the unified billing portal of DHBVN and the bill for the month of December to be raised in January, 2026 will itself be on unified billing portal as assured by the respondent SDO.

2. The status report of the audit being carried out by the audit wing of DHBVN was taken on record but serious observations were raised about the sampling plan used by the Section Officer Audit, DHBVN, Faridabad. Furthermore, it was raised with concern that the Section Officer, DHBVN, Faridabad vide his office memo no. 360 dated 08.12.2025 has mentioned that there are many compliances which are to be ensured by the RWA. The billing is raised on lower side as compared to as per the provisions of sale circular which needs to be addressed and needs to be reconciled post implementation of unified billing. This also needs to be looked into by the Audit wing of the DHBVN.
3. The respondent SDO was also directed to look into the concern raised by the RWA of the Princess Park Society for which the email already stands forwarded to the respondents on dated 21.11.2025 at 16:22 P.M.
4. The redressal of the issue raised by the RWA is very important for proper billing of the consumers to the safeguard the interest of the respondent department as well as the consumer.
5. The RWA also intimated that the audit work by the independent auditor is being got carried out separately and the tenure from 2021 to 2023 has already been audited and it was further apprised that the work is likely to be completed in next one month.
6. The appellant Shri Subodh Grover interjected the proceedings at various occasions on one pretext or the other which was viewed seriously by the Electricity Ombudsman. The complainant was consoled that the Electricity Ombudsman is giving all directions as per the ambit to get the complaint addressed. Thereafter also the complainant kept on raising one or the other issue. After carefully listening to the grounds of the appellant it is decided as under: -
 - (a) The RWA of the Princess Park will get the meter downloaded and will incorporate the consumption data available in the meter for accounting the energy consumption and overhauling the consumer account based on the downloaded meter reading & instead of manually taken readings of the meters installed at the premises of the consumer or at common area.
 - (b) The contentions raised by the appellant for getting the matter investigated from the vigilance wing was turned down on the pretext that the audit of the RWA record is being checked by the audit wing of the DHBVN vis-à-vis the independent auditor deputed by the RWA. Furthermore, this office has also been giving directions to get the unified billing implemented in Princess Park Society which has been ensured by the respondent department and the RWA to be implemented in its letter and spirit for bills of December 2025 to be raised in January 2026.

In view of the above, forgoing in the complaint of the complainant the respondent RWA and the respondent Xen/Operation Division, DHBVN, Greater Faridabad are directed as under: -

- (i) To have a meeting within seven days from the date of issue of this order to resolve the concern raised by the RWA regarding applicability of the tariff which already stands forwarded to the respondent on 21.11.2025 at 16:22 hours.

If need be the matter may be referred to the commercial wing of the DHBVN to sort out the issue but before 31.12.2025 so as to ensure the billing of all the consumers through unified billing portal.

- (ii) The respondent Xen/Operation will ensure that the consumption of the units generated from the DG is also considered in the unified billing portal which has been confirmed by the respondent SDO.
- (iii) The respondent RWA are directed to share the downloaded reading of all the meters (including residential, common area usages) to the appellant. Furthermore, the monthly consumption as downloaded from the meter shall be duly accounted for in the private audit from the date of availability of the reading (from the memory of the meter) till date of actual download. The audited record of the private audit as well as the audit wing of the DHBVN shall be got checked by the respondent Xen/Operation Division, Greater Faridabad and SDO/Operation Division, Kheri Kalan with the audit team of DHBVN to incorporate and address the shortcomings.
- (iv) The RWA will share the copy of audit report by the independent auditor to the appellant also for his information.
- (v) It is at the liberty of the RWA to take the volunteer service offered by the appellant for audit purpose as the complainant kept on impressing that his services should be read as direction. It is hereby clarified that it may be read as discretion. The respondent Xen will furnish the status report of the unified billing in the first week of January 2025 through unified billing portal.

The next date of hearing is 15.01.2026.

- S.** On 17.01.2025, Princess Park Residents Welfare Association has submitted Audit Records and Six-Month Data in Compliance with Interim Order dated 09.12.2025.

This is to respectfully submit that in Appeal No. 37/2025 (Shri Subodh Grover vs. DHBVN & Others), the Hon'ble Electricity Ombudsman was pleased to pass an Interim Order dated 09.12.2025.

In compliance with the directions contained in the said Interim Order, and in adherence to the timelines prescribed therein, we are hereby submitting the following documents for your kind perusal and record:

Available audit-related records as prepared by the independent auditor, and Meter consumption / billing data for the last six (06) months, as per your direction.

The above documents are being furnished to facilitate examination, verification, and further action in accordance with the directions of the Hon'ble Electricity Ombudsman. The Princess Park Residents Welfare Association remains fully committed to complying with all directions issued by the Hon'ble Authority in letter and spirit.

- T.** On 18.01.2026, respondent's counsel (DHBVN) has submitted complied report which is as under: -

1. That, the present compliance Report is being filed by the SDO Operation, DHBVN, Kheri kalan, DHBVN, Faridabad (the "Respondent No. 2"), to the Appeal filed before the Electricity Ombudsman Haryana bearing Appeal No. 37/2025 (the "Appeal").
2. That, this Hon'ble Commission vide Order dated December 09, 2025 directed the RWA and the Respondents to resolve the issue regarding the applicability of the tariff so as to ensure that the billing to all its customers is done through unified billing portal. The relevant extract of the Order is reproduced hereunder:

"In view of the above, forgoing in the complaint of the complainant the respondent RWA and the respondent Xen/Operation Division, DHBVN, Greater Faridabad are directed as under: -

(i) To have a meeting within seven days from the date of issue of this order to resolve the concern raised by the RWA regarding applicability of the tariff which already stands forwarded to the respondent on 21.11.2025 at 16:22 hours.

If need be the matter may be referred to the commercial wing of the DHBVN to sort out the issue but before 31.12.2025 so as to ensure the billing of all the consumers through unified billing portal.

(ii) The respondent Xen/Operation will ensure that the consumption of the units generated from the DG is also considered in the unified billing portal which has been confirmed by the respondent SDO."

3. That, the Respondents in compliance of the aforementioned directions convened a meeting with the Princess Park RWA wherein the RWA has expressly agreed that all the billing of the customers shall be done as per the unified billing portal. The relevant extract of the compliance report is reproduced hereunder:

"In compliance with the Interim Order dated 09.12.2025 passed by the Hon'ble Electricity Ombudsman in Appeal No. 37 of 2025, titled Sh. Subodh Grover, R/o H-1904, Princess Park, Sector-86, Faridabad, the following is respectfully submitted for kind information and record. Pursuant to the directions of the Hon'ble Commission, a meeting was convened with the representatives of the RWA, Princess Park Society on 15.12.2025 to address the issues raised by the RWA vide their representation dated 21.11.2025. During the said meeting, the RWA was directed to implement the Unified Billing Software (UBS) for billing of residents strictly under the Bulk Supply Domestic (BLDS) category, in accordance with Sales Circular D-04/2025, as the society is operating on a single-point connection under the BLDS category.

The RWA of Princess Park Society assured that billing to residents through the Unified Billing Software would be initiated from January, 2026. In this regard, the RWA has also submitted a letter dated 27.11.2025, confirming that the residents' data has already been uploaded on the UBS platform. A copy of the said letter is enclosed as Annexure-A."

A copy of the Compliance report on behalf of the Respondents is annexed hereto and marked as Annexure C-1.

4. Therefore, it is humbly prayed before this Hon'ble Commission that the present Appeal may kindly be dismissed as the Respondents have already fulfilled its role effectively. That, both the parties in compliance of Order dated December 09, 2025 have complied with all the directions passed by this Hon'ble forum. Therefore, in the interest of justice it is prayed that the present appeal may be dismissed as the grievance raised by the Appellants has been addressed by the Respondents.
5. In the present case, the Respondents have already fulfilled its roles by issuing directions to the Builder/Developer for Implementation of Unified Billing System, so that no unnecessary hardship is caused to the residents/consumers. Further, the Respondents has also issued a Sales Circular No. D-23/2022, wherein guidelines where were issued vide letter dated August 30, 2022, which were to be complied with Employer / GHS / Developer/ Users Association for initiating Unified Billing Software facility for managing billing activities inside the premise of their Single Point Supply.

U. Vide email dated 18.01.2026 appellant has submitted as under: -

1. That I have very high regard for your good self-office and filed this appeal with great hope to get justice in the best interests of the society at large. With great hope for justice, let me take this opportunity to draw your kind attention to the fact that " HERC's own orders, rules and directions are not been followed by Princess Park RWA and some of DHBVN officials despite writing many representations of last 3 years to RWA and various officials of DHBVN and electricity dept. including to Director Vigilance office. The some of representations are also attached with under reference appeal also.
2. During last hearing on 9/12/2025 many times humbly tried to request to draw your kind self-attention towards Interim order dt 4/11/2025.

In interim order dt 4/11/2025, At page 1, 2nd para your good self had mentioned that excuse of RWA regarding non-implementation of unified billing software in their Princess Park Society was not found acceptable as a period of more than 3 years have lapsed since the issuance of sales circular no. D-23/2022 dt 30/8/2022 etc. Further in 2nd para its also mentioned that respondent SDO Shri Sunil Chawla informed that in compliance to earlier order dt 29/9/2025 a meeting was held in his office between the complainant /RWA/ SDO Kheri Kalan on dt 1/10/2025 but data for the audit has not been provided by RWA inspite three numbers written communication.

Further at page 2 (top) of interim order its mentioned that regarding implementation of unified billing software in Princess Park society as per sales circular no. D-23/2022 dated 30/8/2022 of DHBVN the responsibility of various have been assigned as per the provisions of the said sales circular.

At sl no. 4 ---complainantsub para XXI of point no. 3 He offered his voluntary service in the matter as far as independent audit is concerned.

On page 2 of interim order under the table further its mentioned that.....

"All the parties are further *directed* to comply the above responsibility assigned without any excuse and submit their responses in the matter .The respondent SDO and RWA representative are *further directed to supply their interim reports to the following activities*" :-

In cl (b) of page 2also mentioned about data to be used by DHBVN authorities to carry out the Audit

It is requested that related copy of Audit / communication by DHBVN authorities also provided to myself .

In cl (c) of page 2 also mentioned about billing about of the individual consumers residing in the colony/ complex done as per appropriate and applicable tariff being issued by DHBVN in he shape of various circular.

At page 3, in cl (d) for independent audit of the billing of the consumers / residentsinvolving Sh Subodh Grover who himself volunteered for participation without any remuneration mentioned.

In interim order dt 9/12/2025 at page 4 cl (v) it is now mentioned thatIt is at the liberty of the RWA to take the volunteer service offered by the appellant for the audit purpose

Sir,

Its humbly and respectfully submitted to reconsider it. As paramount to be Transparency, justice to stop exploitation at large of common residents and to stop misuse of power.

"Basically, its HERC's own orders and directions which are not been followed by Princess Park RWA and some of DHBVN officials despite writing many many representations of last 3 years to RWA and various authorities of DHBVN and electricity dept. including to Director Vigilance office. The some of representations are also submitted with the appeal also.

AS PER LEGAL PRUDENCE - Justice must not only be done but also must appear to be done. Justice must be both real and visible.

Keeping in view of Public trust in system, Transparency and Accountability. Justice must be fair in fact and must look fair to every one.

Recently read in news clipping, Hon'ble Punjab & Haryana High in the matter related to some officials of Faridabad Municipal Corporation has refused anticipatory bail while observing that Corruption by public servants is not just an offence against an individual but constitutes an offence against the society at large eroding public confidence in the administration.....Prevention of Corruption Act are by nature , serious and grave and must be examined carefully.

Further in news about the ruling also mentioned that Allegations revealed active and conscious participation in a well-planned criminal conspiracy involving forgery of public records in fraudulent way and illegal siphoning of public funds.....serious economic offences including abuse of official position...Hon'ble court observed that The settled position of law is that that economic offences and corruption cases are to be viewed with greater circumspection etc.

In referred my appeal also The misuse of official position and abuse of authority without proper investigations should not be ignored.

You are again requested to refer the subject matter for proper investigations to vigilance wing or economic offence wing or other official agency for investigations. The respondent /s holding office and entrusted with powers that directly influence the decision making.

Its also matter of record that despite many reminders about directions etc by Hon'ble Ombudsman time lines never met by respondent /s and orders including of CGRF, Gurgaon ignored and not followed in true letter and spirit.

Now after earlier scheduled hearing of 15th Jan, 2026, RWA sent an email dt 17 Jan, 2025 with some attachment of Audit report. Its pertinent to mention that despite attempting many times attachment of mail on my device of not opening. Hope auditor who has done the audit (as mentioned in the interim order), already and previously not associated with the RWA audit work.

It is requested that in all fairness and transparency hard copy of same attachment may be provided to study for observation and to pursue the the matter further.

Copy of Audit Report of DHBVN authorities as mentioned in interim order may also be provided to study for observation and to pursue the the matter further.

As attachment below please find the latest bill issued (invoice dt 24 Dec, 2025) to a resident of the society.

Electricity inside unit Grid -opening Unit 5661.3, closing Unit 5747.2, Consumption 140.8 (instead of 85.9 units) charged Rs 817.

Being resident, don't know or guess how many such bills are there as there as no transparency for residents or bills are issued as per HERC rules, regulations and prescribed formats. As per HERC rules, regulations and directions common area electricity units including DG power back recorded, charged and billed to residents. Is factually any meters installed for recording the consumption of common area electricity and their status of working condition and seal etc.

With my appeal also many wrong bills attached without any rectifications or reply of RWA despite communicating / informing including for common area electricity charges related including highly inflated charges issue.

Further Its humbly submitted that I am trying my best to reschedule the doctor's visit of my close relative (an 87 years old diabetic foot patient which is scheduled in afternoon for dressing of wounds and to whom I have to take to doctor in Delhi. Awaiting confirmation from the doctor so that I can visit Panchkula to attend the hearing after spending my own despite retired senior citizen.

While I am taking into stride, as it does not weaken the spirit rather strengthen the commitment to fairness, truth, transparency and for implementation of related HERC rules and regulations in true letter and spirit.

- V.** On 19.01.2026, SDO respondent has submitted compliance report in respect of interim order dated 09.12.2025 which is as under: -

In compliance with the Interim Order dated 09.12.2025 passed by the Hon'ble Electricity Ombudsman in Appeal No. 37 of 2025, titled Sh. Subodh Grover, R/o H-1904, Princess Park, Sector-86, Faridabad, the following is respectfully submitted for kind information and record.

Pursuant to the directions of the Hon'ble Commission, a meeting was convened with the representatives of the RWA, Princess Park Society on 15.12.2025 to address the issues raised by the RWA vide their representation dated 21.11.2025.

During the said meeting, the RWA was directed to implement the Unified Billing Software (UBS) for billing of residents strictly under the Bulk Supply Domestic (BLDS) category, in accordance with Sales Circular D-04/2025, as the society is operating on a single-point connection under the BLDS category.

Further it is submitted that RWA of Princess Park Society has successfully uploaded the resident's data on Unified Billing Software and same has been confirmed by letter on dated 27.11.2025 (copy of same is attached as Annexure-A). Further it is submitted that now RWA of society has generated the residents bill through UBS (copy of 25 bills (randomly) is attached as Annexure -B).

In accordance with the directions of the Hon'ble commission, RWA of society has undertaken a third-party independent audit of its electricity billing practices, tariff application, energy reconciliation and regulatory compliance (copy of audit report is attached as Annexure-C). As per the third-party audit report some observations are identified.

1. Different methods were applied by RWA of society for calculating the per unit electricity tariff during the period under audit. The absence of a uniform methodology across all months resulted in variations between the units purchased from DHBVN and the units billed to residents in certain instances.

2. Although DHBVN mandates the use of the Unified Billing System (UBS) portal, RWA of society continued with manual, Excel-based billing. While this reliance on manual systems appears to be driven by practical constraints, it may increase the risk of data inconsistencies
3. As per month-wise reconciliation and variance analysis, identifies instances of net short billing and excess billing arising during the period under audit; accordingly, the responsibility for appropriate recovery or adjustment of the net short-billed amounts from residents/consumers, based on these audited figures, rests with the management of RWA.

Further as per the audit report submitted by the Section Officer, DHBVN, dated 08.12.2025 (copy of audit report is attached as Annexure-D), some observation has been identified by the Section Officer, DHBVN is given as under:

1. RWA charges from the residents of the society in DS category on lessor side in comparison of tariff of DHBVN
2. The Sales Circular D-23/2022 of DHBVN have not been adopted by the RWA of society to raise the bills to individual residents of society.

Further it is submitted that as per both the audit reports, it is observed that RWA of society charges from residents on lessor side in comparison of tariff of DHBVN and the difference amount is paying by the RWA of society from common RWA's fund.

The above facts are submitted in compliance with the directions of the Hon'ble Ombudsman for kind perusal and further necessary action please.

W. Hearing was held on 20.01.2026 as re-scheduled, with the appellant and representatives of the Princess Park Residents Welfare Association (RWA) participating via video conference, and the respondent SDO along with the counsel for DHBVN appearing physically. The appellant attended the hearing through video conference citing personal reasons vide his email dated 18.01.2026.

During the hearing, the respondent SDO informed that compliance with the interim order dated 09.12.2025 has been achieved. Specifically, the UBS data has been uploaded by the RWA, and billing for the month of December 2025 (to be issued in January 2026) will be generated through the UBS portal. The respondent SDO, vide his letter bearing No. 4844 dated 19.01.2026, also supplied sample copies of 25 bills for the invoice period of November 2025 (due in December 2025) as evidence of bill generation through the unified billing portal.

The representative of the RWA informed that bills require time for scrutiny, with generation likely to be completed by 25th January 2026. It was further noted that the RWA has replaced their meter, with completion expected by 30.01.2026, which will streamline bill generation in a more effective manner. The RWA representative stated that observations regarding under-charging from residents will be addressed as per the independent audit and the audit by the Section Officer of DHBVN, in a transparent, informed, and impartial manner. Notices will be served to affected

residents detailing the shortfalls, with ample opportunity provided for payment of dues.

The appellant informed that he has not received hard copies of the audit report by the independent auditor (M/s Pratibha Bhaker and Associates) or the DHBVN audit report. The email shared by the RWA is not opening on his device. To this, the RWA, respondent SDO, and respondent counsel agreed to supply hard copies to the appellant.

The appellant further raised a point regarding an erroneous charging of Rs. 40,000/- in 2023. The RWA representative explained that this was an initial effort during the shift to UBS, where a multiplication factor error led to incorrect bills, as also noted in the independent audit report.

Decision

After hearing both parties and reviewing the record on file, including the compliance status with the directions issued vide the interim order dated 09.12.2025, the following observations and directions are made. This order is divided into Part-A (addressing the specific grievance of the appellant) and Part-B (addressing broader systemic issues for the general public in Group Housing Societies (GHS), arising from non-implementation of UBS, to prevent similar grievances).

The respondent SDO has confirmed that the data of all residents of Princess Park Society has been uploaded onto the Unified Billing System (UBS) portal of DHBVN, and bills for December 2025 (issued in January 2026) will be generated through this platform. Sample bills, including that of the appellant, have been provided as demonstration.

Furthermore, in his reply vide memo no. spl.-1 dated 17.01.2026 (point no. 5), the respondent SDO noted that an audit was conducted by the DHBVN audit wing based on sample data. The Section Officer (Audit), DHBVN, Faridabad, observed that the RWA has been charging residents in the Domestic Supply (DS) category at rates lower than the applicable DHBVN tariffs. Such discrepancies will be reconciled post full implementation of UBS-based billing by the RWA.

The RWA has submitted a copy of the independent audit report prepared by M/s Pratibha Bhaker and Associates, Chartered Accountants, covering the period from September 2021 to November 2025. The report highlights certain discrepancies in billing practices, though it notes that these appear to be non-intentional.

Upon examination, it is observed that the RWA has not adopted a uniform principle for billing its residents, despite the availability of the UBS for over three years as mandated under DHBVN Sales Circular No. D-23/2022 dated 30.08.2022 (issued in compliance with the Haryana Electricity Regulatory Commission (Single Point Supply to Employers' Colonies, Group Housing Societies and Residential Colonies, Commercial cum Residential Complexes of Developers and Industrial Estates/IT Park) Regulations, 2020, hereinafter referred to as "HERC Single Point Supply

Regulations, 2020"). This constitutes a serious lapse on the part of both the RWA and the DHBVN authorities, particularly the concerned Sub-Divisional Officer (SDO) and Executive Engineer (XEN), who have failed to ensure timely implementation of the UBS in the areas under their jurisdiction, in violation of Clause XIII and XIV of Sales Circular No. D-23/2022, which require mandatory onboarding of RWAs and use of UBS for all billing activities to ensure transparency and adherence to HERC-approved tariffs.

The shortcomings identified in the independent audit report regarding net short-billing to residents require the RWA to recover such amounts in an equitable, transparent, and well-communicated manner, ensuring no undue hardship to any resident. Any recovery must be spread over a reasonable period (not less than 6 months) and justified with clear calculations provided to affected consumers, in line with Clause XI of Sales Circular No. D-23/2022, which mandates billing as per HERC-approved tariffs and formats, and Regulation 1.5(j) of the HERC Forum and Ombudsman Regulations, 2020, defining "deficiency" to include shortcomings in billing and performance standards. The RWA is hereby permitted to recover these electricity shortfall dues from the respective residents by issuing notices with detailed calculations and ample timelines (at least 30 days for response and payment in instalments), so that the dues—previously absorbed by the RWA's funds to match DHBVN bills—can be recovered without prejudice.

Electricity Ombudsman expresses deep concern over the sluggish progress in shifting consumers to the UBS, despite its availability for more than three years. Serious issues have also been noted regarding the functioning of DHBVN's IT cell, which has been unable to resolve technical glitches faced by RWAs in implementing the UBS. This indifferent approach by DHBVN authorities—from the sub-division level up to the Superintending Engineer (SE)/IT Wing, SE/R-APDRP, SE/Commercial, and Chief Engineer/Commercial—has allowed RWAs/builders to continue billing through non-standard, private applications, leading to overcharging, lack of transparency, and consumer discontent in Group Housing Societies (GHS), contravening Regulation 1.5(g) of the HERC Forum and Ombudsman Regulations, 2020 (defining "consumer grievance" to include billing disputes and violations of the Electricity Supply Code) and Section 42(5) & (6) of the Electricity Act, 2003 (mandating forums and ombudsman for grievance redressal).

PART-A (Specific to Appellant's Grievance) Considering the hardships faced by the appellant in highlighting the irregularities in energy accounting and the non-implementation of transparent billing mechanisms, a penalty of Rs. 2,000/- is imposed on the RWA under Regulation 25 of the HERC Forum and Ombudsman Regulations, 2020, for contributory negligence and non-compliance with regulatory directives, including failure to implement UBS in a timely manner as per Sales Circular No. D-23/2022. The RWA shall pay this amount to the appellant by way of a cheque within 15 days of this order and submit proof of payment to this forum.

To maintain ongoing transparency, the respondent SDO shall ensure that audits of the energy account and billing activities are conducted quarterly by the Chief

Auditor, DHBVN, in the presence of RWA representatives and voluntary experts (including the appellant, at the RWA's discretion), as per Clauses XVIII, XIX, and XX of Sales Circular No. D-23/2022 (requiring audits for transparency in energy accounting and billing). Honorarium shall be paid to such representatives upon successful completion of audits, as per Clause XXII. Copies of audit reports shall be provided to the appellant and this forum within 15 days of completion. Hard copies of all existing audit reports (DHBVN and independent) shall be supplied to the appellant by the RWA and SDO within 21 days.

PART-B (For General Public Interest in GHS) In view of the above, and to enforce compliance with the HERC Single Point Supply Regulations, 2020, and DHBVN Sales Circular No. D-23/2022, the following directions are issued:

The respondent DHBVN, through its Chief Engineer/Commercial, Hisar, shall file a detailed action plan and timeline-not exceeding three months from the date of this order-for the complete implementation of the UBS across all Group Housing Societies under its jurisdiction, including smart metering as envisaged under the Revamped Distribution Sector Scheme (RDSS) and in alignment with Clause 5.4 of the HERC (Smart Grid and Smart Meter) Regulations, 2019. This plan shall include steps for onboarding RWAs, resolving technical issues, ensuring mandatory use of the UBS for all billing activities as per Clauses XIII and XIV of Sales Circular No. D-23/2022, and necessary modifications to metering provisions to enable remote reading, thereby minimizing manual interventions and potential unethical practices while ensuring transparency and accuracy in billing, in line with Regulation 1.5(k) of the HERC Forum and Ombudsman Regulations, 2020 (defining "electricity service" to include metering and maintenance). A compliance report, supported by an affidavit from the designated officer, shall be submitted to this forum within 15 days of the timeline's completion, along with fortnightly progress reports during the implementation period. Failure to adhere may lead to proceedings under Sections 142 and 146 of the Electricity Act, 2003, for non-compliance with Commission directions, with cognizance recommended to Hon'ble HERC.

The appeal no. 37 of 2025 stands disposed of in terms of Part-A, but the respondent DHBVN will continue to submit compliance reports for Part-B till full resolution within a maximum of 3 months from the date of issuance of this order. Non-compliance with Part-B shall result in the matter being forwarded to Hon'ble HERC for cognizance and initiation of proceedings under Sections 142 and 146 of the Electricity Act, 2003, to safeguard public interest, transparency in billing, and ethical practices for end-consumers in GHS as per Sales Circular D-23/2022.

Both parties to bear their own costs. File may be consigned to record.

Given under my hand on 22nd January, 2026.

Sd/-
(Rakesh Kumar Khanna)
Electricity Ombudsman, Haryana

Dated: 22.01.2026

CC

To

1. Shri Subodh Grover, R/o H-1904, Princess Park, Sector-86 Faridabad – 121002, Haryana (Email Subodh_grover@yahoo.com)
2. The Managing Director, DHBVN, Hisar (Email md@dhbvn.org.in).
3. Legal Remembrancer, Haryana Power Utilities, Panchkula (Email lr@hvpn.org.in).
4. The Chief Engineer Operation, DHBVN, Delhi (Email ceopdelhi@dhbvn.org.in).
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7. SDO/OP, Kheri Kalan, DHBVN, Faridabad (Email sdoopkherikalan@dhbvn.org.in)
8. M/s Countrywide Promoters, Princess Park Sec-86, Faridabad (Email customercare@bptp.com, Shashi.saxena@bptp.com, jay.shankar@bptp.com)
9. The Princess Park Residents Welfare Association Sector-86, Faridabad (Email parkprincessrwa@gmail.com)

