

ALL INDIA POWER ENGINEERS FEDERATION



(REGISTERED UNDER SOCIETIES ACT XXI of 1860), Regd. No. 24085/93

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No. 32 - 2026/Karnataka.

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To

**The Hon'ble Chief Minister of Karnataka
Government of Karnataka
Vidhana Soudha
Bengaluru – 560001.**

**Through:
The ACS
Energy Department
Government of Karnataka**

Respected Hon'ble Chief Minister,

Subject: Urgent Intervention Sought Regarding Five Parallel Distribution Licence Applications Filed by M/s Tata Power Company Limited Before KERC (Petition Nos. MP 02/2026 to MP 06/2026) Covering 19 Districts Across All Five State ESCOMs in Karnataka — Threat to Public Electricity Infrastructure, Consumer Welfare and State ESCOM Viability — Invocation of Section 108 of the Electricity Act, 2003.

The All India Power Engineers Federation (AIPEF), the apex national body representing power engineers across India, respectfully submits this representation seeking the urgent intervention of the Government of Karnataka in a matter of immense public importance affecting the electricity consumers, farmers, rural communities and the long-term financial sustainability of Karnataka's State Electricity Supply Companies (ESCOMs).

M/s Tata Power Company Limited has filed five separate petitions before the Karnataka Electricity Regulatory Commission (KERC) seeking grant of parallel distribution licences across Nineteen districts spanning all five ESCOM jurisdictions in Karnataka.

I. LEGAL POSITION — APPLICATIONS ARE PREMATURE AND LEGALLY UNSUSTAINABLE

The Sixth Proviso to Section 14 of the Electricity Act, 2003 permits grant of a parallel distribution licence only where the applicant establishes and operates its own independent distribution network. This requirement is a mandatory statutory precondition and not a mere procedural formality.

However, the petitions filed by M/s Tata Power Company Limited do not disclose any credible, funded or technically feasible plan for establishing an independent distribution network across the proposed Nineteen districts.

II. IRREVERSIBLE IMPACT ON KARNATAKA'S POWER SECTOR AND CONSUMERS

A. Collapse of Existing Cross-Subsidy Framework

Karnataka's electricity tariff structure is fundamentally dependent on cross-subsidy, wherein high-paying commercial and industrial consumers support subsidised electricity for domestic consumers, agricultural consumers and vulnerable sections.

A private parallel licensee would inevitably target profitable HT and commercial consumers in urban centres while avoiding low-revenue rural and social-obligation consumers.

B. Threat to Financial Viability of ESCOMs

Loss of premium revenue-paying consumers to a private licensee would weaken ESCOM finances, affect infrastructure investments and threaten continuity and quality of public electricity supply.

C. Rural Electrification and Universal Service Obligations

State ESCOMs are statutorily obligated to supply electricity to all categories of consumers including remote villages, agricultural pump sets and economically weaker sections.

III. INVOCATION OF SECTION 108 OF THE ELECTRICITY ACT, 2003

AIPEF respectfully requests the Government of Karnataka to issue appropriate policy directions to KERC under Section 108 of the Electricity Act, 2003 to ensure protection of public interest.

IV. PRAYER

AIPEF most respectfully prays that the Government of Karnataka may kindly:

(a) Direct the Energy Department to urgently examine Petition Nos. MP 02/2026 to MP 06/2026 and conduct a comprehensive impact assessment before further proceedings before KERC.

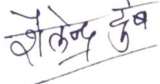
(b) Issue appropriate Policy Directions under Section 108 of the Electricity Act, 2003 to safeguard consumer welfare, financial stability of ESCOMs and public electricity infrastructure.

(c) Direct KERC to implead BESCO, HESCO, MESCOM, GESCOM and CESC as necessary respondents and permit detailed objections regarding financial and technical implications.

(d) Pass such further orders deemed necessary to safeguard Karnataka's electricity sector and the interests of crores of domestic, agricultural and rural consumers.

With regards,

Yours faithfully,



Shailendra Dubey
Chairman