

ALL INDIA POWER ENGINEERS FEDERATION



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

REGD HEAD OFFICE B-1A/45A, Janakpuri, New-Delhi-10058

Corres. Address of CHAIRMAN-Hydel Field Hostel, 17 Rana Pratap Marg Lucknow-226001

M: 09415006225 Phone : 0522-4107706(Off), FAX:0522-2205417/0522-4079628

Email : chairmanaipef@gmail.com ersdubeylko@gmail.com & ersdubey@yahoo.com

No. 54 - 2026 /AIPEF / HERC

05-10-2026

To

The Secretary,
Haryana Electricity Regulatory Commission,
Bays No. 33-36, Sector-4,
Panchkula – 134112, Haryana.

Subject: Reminder to AIPEF Letter No. 53 dated 29.09.2026 — Request for effective hearing, complete transparency and no unilateral/final decision in HERC Petition No. 30 of 2026 regarding proposed Parallel Distribution Licence to Eleven Power Private Limited for Gurugram and Nuh.

Sir,

I write on behalf of the All India Power Engineers Federation (AIPEF) in continuation of our Letter No. 53-2026/AIPEF/HERC dated 29.09.2026, whereby AIPEF had strongly objected to the manner in which the proceedings in HERC Petition No. 30 of 2026 were being conducted and had requested an effective opportunity of oral hearing before any final decision is taken on the proposed Parallel Distribution Licence for Gurugram and Nuh.

Despite the seriousness of the issues raised by AIPEF, we have not so far received any written communication from the Hon'ble Commission clarifying the position or granting AIPEF the effective hearing specifically requested in our aforesaid letter.

AIPEF is, therefore, constrained to reiterate its request and place the following points on record:

1. AIPEF has never declined the opportunity of hearing

As clearly explained in our Letter No. 53 dated 29.09.2026, AIPEF did not decline a hearing. AIPEF had requested a reasonable date after 02 October 2026, keeping in view the prior commitments and travel requirements of its senior office-bearers from Lucknow and Hyderabad.

A request for a short and reasonable adjournment cannot reasonably be construed as abandonment or waiver of the right to be heard.

AIPEF had already submitted detailed written objections/comments on the original petition on 19.06.2026 and its comments on the Expert Committee Report on 14.09.2026. The request for oral hearing was only intended to explain and supplement those written submissions before the Commission takes a final view.

2. The matter is of exceptional public importance

The proposed Parallel Distribution Licence for Gurugram and Nuh is not an ordinary commercial licensing matter.

Gurugram and Nuh constitute economically and strategically important areas of Haryana and include major industrial, commercial and high-revenue load centres. Any restructuring of the distribution arrangement in these areas can have far-reaching implications for:

- the existing public distribution licensee;
- electricity consumers;
- farmers and subsidised categories of consumers;
- cross-subsidy arrangements;
- employees and engineers;
- distribution infrastructure and system planning; and
- the long-term financial viability of the public electricity distribution system.

The Commission itself had earlier recognised the magnitude and long-term implications of the proposed investment and its possible impact on consumers, the existing distribution licensee and the overall regulatory framework. In such circumstances, procedural fairness and adequate stakeholder participation become all the more essential.

3. There must be no haste or predetermined outcome

AIPEF has serious apprehensions regarding the speed and manner in which the proceedings are being taken towards their conclusion.

We respectfully submit that there should be no unilateral, hurried or predetermined decision in a matter involving the possible grant of a parallel distribution licence in one of the highest-revenue areas of the State.

AIPEF is not alleging that the Hon'ble Commission has already taken any decision in favour of the applicant. However, the circumstances surrounding the proceedings require that the entire process should remain demonstrably transparent, neutral, participative and consistent with the principles of natural justice.

4. The filing of a caveat by the applicant requires greater transparency

AIPEF has also noted that Eleven Power Private Limited has approached the Hon'ble Punjab and Haryana High Court by filing a caveat, apparently anticipating a possible legal challenge to the outcome of the ongoing regulatory proceedings.

AIPEF had already placed this concern before the Hon'ble Commission.

We respectfully reiterate that such a development naturally raises questions which deserve to be addressed through complete transparency in the regulatory process. AIPEF does not make any allegation merely on the basis of filing of a caveat; nevertheless, the

circumstances make it particularly important that every affected stakeholder is provided a genuine and meaningful opportunity to be heard before any final order is passed.

5. The proposed licence requires comprehensive scrutiny

AIPEF has already placed before the Commission serious issues concerning the applicant's experience, financial capability, infrastructure preparedness and capacity to discharge the statutory obligations of a distribution licensee.

As already brought on record, Eleven Power Private Limited was incorporated only in 2025 and has a paid-up share capital of ₹1 crore, whereas the proposed investment requirement indicated in the proceedings is of several thousand crore rupees.

These issues require careful and transparent examination before any decision is taken under the Electricity Act, 2003 and the applicable rules and regulations.

6. Request for effective hearing and restraint from final order

- i.** In view of the exceptional importance of the matter, AIPEF once again respectfully requests the Hon'ble Commission to:
- ii.** Take this letter on record as a formal reminder and continuation of AIPEF Letter No. 53 dated 29.09.2026;
- iii.** Grant AIPEF a full, meaningful and effective opportunity of oral hearing on its objections/comments on the Expert Committee Report and the proposed Parallel Distribution Licence;
- iv.** Clearly record that AIPEF's earlier request was not a refusal or waiver of hearing, but only a request for a reasonable date to enable its senior office-bearers to appear effectively;
- v.** Refrain from passing any final order granting the proposed Parallel Distribution Licence to Eleven Power Private Limited until AIPEF has been afforded such effective hearing and its submissions have been duly considered;
- vi.** Ensure that all affected stakeholders, including the existing public DISCOM, employees, engineers, consumers, farmers and other objectors, are afforded a fair and meaningful opportunity to place their submissions before the Commission;
- vii.** Ensure that all substantive objections and submissions filed by the stakeholders are duly considered and specifically dealt with in the final order; and
- viii.** Maintain complete institutional neutrality, transparency and procedural fairness, so that there is no apprehension whatsoever of a predetermined outcome.

AIPEF once again places on record that it has the highest respect for the statutory authority and independence of the Hon'ble Commission. At the same time, considering the enormous public interest involved, AIPEF firmly believes that no parallel distribution licence should be granted in haste or through a process which does not provide all affected stakeholders a genuine and effective opportunity of participation.

The issue is not merely about the commercial interests of one applicant. It concerns the future of the public electricity distribution system of Haryana, the financial viability of the existing public DISCOM, the interests of consumers and farmers, and the legitimate concerns of thousands of power engineers and employees.

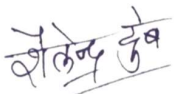
AIPEF therefore earnestly requests the Hon'ble Commission to ensure that the proceedings are carried forward with the highest degree of transparency, fairness and institutional propriety.

AIPEF reiterates its full faith in the statutory and judicial institutions of the country. However, should any unilateral decision be taken without providing AIPEF and other affected stakeholders an effective opportunity of hearing, AIPEF shall be constrained to pursue such democratic, constitutional and lawful remedies as may be available to it in the larger public interest.

We sincerely hope that the Hon'ble Commission will consider this request in the proper perspective and provide AIPEF an early date of hearing before proceeding further towards any final determination in HERC Petition No. 30 of 2026.

With highest regards,

Yours faithfully,



Shailendra Dubey
Chairman

Copy to:

- 1. The Chairman/Officiating Chairman, HERC, Panchkula.**
- 2. The Members, HERC, Panchkula.**
- 3. The Principal Secretary (Power), Government of Haryana, Chandigarh.**
- 4. The Chairman-cum-Managing Director, Uttar Haryana Bijli Vitran Nigam Ltd. /
Dakshin Haryana Bijli Vitran Nigam Ltd., as appropriate.**