

**BEFORE THE HON'BLE ARUNACHAL PRADESH
STATE ELECTRICITY REGULATORY COMMISSION,
AT ITANAGAR**

PETITION NO. OF 2026

IN THE MATTER OF:

Petition under Section 62(3) of the Electricity Act 2003 read with Regulation 43 of the Arunachal Pradesh State Electricity Regulatory Commission (Conduct of Business) Regulations, 2011 seeking the fixation of a separate tariff category for ferro-alloy consumers.

AND IN THE MATTER OF:

Prasam Alloycraft Industries LLP

Shop No.15, 2ndFloor, AT ROAD,

Paltan Bazar, Guwahati G.P.O.,

Kamrup, Assam - 781001

... Petitioner

Versus

Department of Power, Government of Arunachal Pradesh

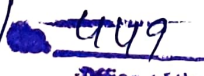
Vidyut Bhawan, Itanagar,

Arunachal Pradesh -791111

...Respondents

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Place:

Date:

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Vidyut Bhawan, Itanagar,
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...Respondent

MOST RESPECTFULLY SHOWETH

1. The present Petition is being filed under Sections 62 of the Electricity Act, 2003 (“the Act”) read with Regulation 43 of the Arunachal Pradesh State Electricity Regulatory Commission (Conduct of Business) Regulations, 2011 invoking the statutory powers of the Hon’ble Arunachal Pradesh State Electricity Regulatory

Commission (“**State Commission**”) to determine tariff and regulate electricity purchase, distribution, and supply within the State of Arunachal Pradesh. The Petitioner seeks introduction of a distinct and dedicated tariff category for Ferro-Alloy Consumers, in recognition of the unique operational, economic, and grid-related characteristics of such industries.

2. The Petitioner, Prasam Alloycraft Industries LLP (“Prasam Alloycraft”) is in the process of establishing a ferro-silicon manufacturing facility at Roing, Lower Dibang Valley District, with a proposed contract demand of approximately 42 MVA. The proposed facility will be connected at the Extra High Tension (EHT) level and is expected to operate at a consistently high load factor, thereby constituting a substantial base-load industrial consumer within the State grid. It is pertinent to note that other than the Petitioner, there are about nine more ferro-alloys consumers in the state with a cumulative contract demand of 172 MW.
3. The Petitioner’s proposed operations are intrinsically energy-intensive, with electricity constituting a dominant component of production cost. The viability, competitiveness, and long-term sustainability of such industrial operations are therefore directly contingent upon appropriate tariff determination.
4. The issues raised in the present Petition arise in the broader context of the ongoing tariff proceedings before this Hon’ble Commission initiated by the Department of Power, Government of Arunachal Pradesh, for:
 - i. True-up for FY 2024–25;
 - ii. Annual Performance Review for FY 2025–26;

iii. Aggregate Revenue Requirement (ARR) and Retail Tariff determination for FY 2026–27.

5. While the Petitioner has already filed detailed objections and suggestions dated 23.01.2026 in the above tariff proceedings, the present petition is concerned with the issue of tariff classification which transcends the limited scope of annual ARR determination.
6. In these circumstances, and in order to enable this Hon'ble Commission to exercise its statutory mandate under Section 62 of the Act, the Petitioner has been constrained to approach this Hon'ble Commission by way of this instant Petition seeking tariff redesign through the introduction of a dedicated category for Ferro-Alloy / Energy-Intensive Industrial Consumers.

FACTUAL BACKGROUND

7. Often referred to as the "Powerhouse of India," Arunachal Pradesh occupies a unique position in the national energy landscape due to its estimated hydroelectric potential of over 57,250 MW - roughly 40% of India's total hydro potential. Despite this vast capacity, the State's own power sector is characterized by relatively low internal demand and high logistical challenges.
8. The Department of Power ("DoP") and the Arunachal Pradesh Power Corporation Pvt. Ltd. ("APPCPL") manage the State's power needs, primarily focusing on distributing power across a rugged, hilly terrain with a sparse population.

9. The demand and consumption profile of the State remains modest compared to its potential. The peak electricity demand currently oscillates between 180 MW and 200 MW, while the annual energy requirement is approximately 800- 1,000 Million Units (MU). Consumption is heavily skewed toward the domestic and public services sectors, with a significantly low industrial base. This leads to a unique "surplus-deficit" paradox: while the State has surplus power during the monsoon due to high hydro-generation, it sometimes faces localized shortages during the winter lean-flow period or due to transmission bottlenecks in remote areas.
10. The power procurement pattern of Arunachal Pradesh is dominated by allocations from Central Generating Stations ("CGS") in the North Eastern Region. The State receives the bulk of its energy from North Eastern Electric Power Corporation (NEEPCO), National Hydroelectric Power Corporation (NHPC), and National Thermal Power Corporation (NTPC). Additionally, the State-owned small hydro projects contribute a small but vital portion of the mix, especially for decentralized supply in remote districts. Being a member of the North Eastern Regional Grid, the State also engages in power banking and seasonal trading to manage its surplus energy during high-monsoon months.
11. The typical category-wise sales of power within the State for FY 2025-26 is summarized below:

Sales for FY 2025-26 (in MU)				
HT/ EHT Industrial	HT/ EHT Commercial	LT Domestic	LT Commercial	Other

42%	3%	33%	12%	10%
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12.The Summary of the Power Sales within the State over the past few years is as below:

FY	2021-22 (Actual)	2022-23 (Actual)	2023-24 (Actual)	2024-25 (Actual)	2025-26 (Proj.)
Sales	518.25	582.10	673.41	728.18	856.62

13.Over the past few years, the Demand- Supply Position of the State has been as below:

FY	Energy Requirement (MU)	Energy Supplied (MU)	Energy Deficit/ Surplus (MU)	Peak Demand (MW)	Peak Met (MW)	Demand Deficit/ Surplus (MW)
2021-22 (Actual)	856	855	1	197	168	29
2022-23 (Actual)	895	875	20	166	166	0
2023-24 (Actual)	1005	1005	0	186	186	0
2024-25 (Actual)	1050	1050	0	218	191	27
2025-26 (Proj.)	1232	2418	(1186)	233	478	(245)

14.From the Load Generation Balance Report(“**LGB Report**”) published by the Central Electricity Authority(CEA) for FY 2025-26, it is observed that there is a surplus of power both in terms of energy and peak demand for the State of Arunachal Pradesh. To promote the internal consumption of such energy

generated within the State as well as to harness the potential of the State, Ferro-Alloy and Steel Rolling Industries form a vital part towards the development of the State. The LGB Report for FY 2025-26 has been annexed hereto as “Annexure P1”.

15. With the upcoming large scale Ferro-Alloy Industries in the State, the industrial consumption is estimated to increase in the following manner:

FY	2025-26 (Proj.)	2026-27 (Proj.)	2027-28 (Proj.)	2028-29 (Proj.)	2029-30 (Proj.)
Sales to HT/ EHT Industrial Consumers	357.41	447.31	752.24	1077.39	1082.87

16. It is assumed that the existing consumption of 11 and 33 kV consumers are escalated as per the existing standards and based on the phasing of upcoming Ferro-Alloy Industries, the consumption is proposed to be increased in the 132 kV voltage level. This increase in consumption will ease the high energy surplus projected in the future considering the upcoming generating stations within the State.

17. Financially, the Average Power Purchase Cost (APPC) for the State typically ranges between Rs.3.00 and Rs.3.50 per unit, influenced by the tariffs set by central regulators for the hydro and thermal plants in the region. However, the "cost to serve" is significantly higher due to the State's exceptionally high Aggregate Technical and Commercial (AT&C) losses, which is about 40%. The summary of the AT&C losses over the past few years is summarized below:

FY	2021-22 (Actual)	2022-23 (Actual)	2023-24 (Actual)	2024-25 (Actual)	2025-26 (Proj.)
AT&C Losses	50.70%	56.24%	41.72%	39.76%	29.56%

18. These losses are primarily driven by the long, radial transmission lines required to reach hilly settlements, difficult maintenance conditions, and billing challenges in isolated regions.

PRELIMINARY SUBMISSIONS

19. The present Petition seeks the creation of a separate tariff category for ferro-alloy and other energy-intensive industrial consumers, based on the distinct operational and consumption characteristics exhibited by such industries, such as:

- i. consistently high load factor, typically exceeding 80%, reflecting sustained utilisation of contracted demand;
- ii. continuous and predictable demand profile, which reduces demand volatility and enhances system planning;
- iii. grid-supportive operational characteristics, including improved system load factor, reduction in fluctuations, and enhanced utilisation of generation assets;
- iv. significant contribution to the State's industrialisation objectives, economic growth, and long-term revenue stability for the distribution licensee.

20. The Petitioners submit that the proposed tariff differentiation is fully consistent with the statutory framework under Section 62(3) of the Act which expressly permits differentiation among consumer categories based on objective and rational criteria such as:

“the consumer's load factor, power factor, voltage, total consumption of electricity during any specified period or the time at which the supply is required or the geographical position of any area, the nature of supply and the purpose for which the supply is required.”

21. The Petitioner humbly submits that the power of Electricity Boards/ Commissions to fix different tariff rates has been a part of Indian energy jurisprudence since the very beginning. Reference may be made to Section 49(3) of the Electricity (Supply) Act, 1948 (“**1948 Act**”) which corresponds to Section 62(3) of the current 2003 Act. Section 49(3) of the 1948 Act allowed the erstwhile Board to fix different tariffs for the supply of electricity to any person not being a licensee, having regard to the geographical position of any area, the nature of the supply and purpose for which supply is required and any other relevant factors, if it was considered necessary or expedient to do so.

22. It was by virtue of the 2003 Act that the Commissions’ powers to determine different tariffs were expanded to factors like the consumer's load factor, power factor, voltage, total consumption during any specified period, the geographical position of any area, the nature of supply and the purpose of supply. Hence, even before the coming of the 2003 Act, the established position remained that the erstwhile Board was, by virtue of Section 49(3), expressly authorised to fix different tariffs for the supply of electricity basis the nature of the supply, the

purpose of supply and other relevant factors [*Rohtas Industries Ltd. v. Chairman, B.S.E.B.*, 1984 SCC OnLine SC 271].

23. Courts have maintained that any State or a Central Commission can carry out a tariff differentiation basis the foundation of intelligible differentia. The Supreme Court in *Ferro Alloys Corporation Ltd., Vizianagaram vs APSEB Somajiguda*, 1993 SCC OnLine AP 25, held:

*“9. The settled position of law, as was submitted by the learned counsel for the Industrial concerns in the proceedings, is that any classification made must be founded on intelligible differentia which must have rational relation to the object sought to be achieved. The validity of the classification would be upheld if only the classification has a rational nexus with the object sought to be achieved. In *State of J. & K. v. T.N Khosa*, AIR 1974 SC page 1 (Head Note D) the Supreme Court held:*

‘The relevant material is always admissible to show the reasons and the justification for the classification. Such reasons need not appear on the face of the rule or law which effects the classification.

Classification must be truly founded on substantial differences which distinguish persons grouped together from those left out of the group and such differential attributes must bear a just and rational relation to the object sought to be achieved.

Judicial scrutiny can therefore extend only to the consideration whether the classification rests on a reason-able basis and whether it bears nexus with the object in view. It cannot extend to embarking upon a nice or mathematical evaluation of the basis of classification, for were such an

inquiry permissible it would be open to the Courts to substitute their own judgment for that of the legislature or the rule-making authority on the need to classify or the desirability of achieving a particular object.’’

24. The Petitioner thus respectfully submits that the creation of a distinct tariff category for ferro-alloy and similar energy-intensive industries would represent a rational and legally permissible exercise of regulatory discretion, aimed at balancing consumer interest and industrial development, alongside grid efficiency and financial sustainability of the electricity sector within Arunachal Pradesh.

25. It is also pertinent to note that the Meghalaya State Electricity Regulatory Commission by order dated 10.09.2018 also created a separate category for Ferro Alloys consumers and granted them competitive tariff. In fact, the Licensee therein had supported the creation of a separate category of ferro-alloys consumers. This order has not been challenged and has attained finality. Copy of the order of Meghalaya Commission is annexed hereto as “**Annexure P2**”.

ECONOMIC AND GRID-LEVEL JUSTIFICATION

26. The ferro-alloy and steel rolling industries constitute the backbone of modern infrastructure and industrial development. Ferro-alloys such as Ferro-Silicon and Ferro-Manganese are indispensable inputs in steel manufacturing. Without ferro-alloys, production of quality steel suitable for infrastructure, defence, transportation, and construction is not feasible. These industries therefore

occupy the position of “core” or “mother” industries in the broader industrial ecosystem.

27. This is fortified by the fact that High Tension (HT) Consumers have often been recognized as a separate class of consumers from Low Tension consumers. The Supreme Court in ***Hindustan Zinc Ltd. Etc. Etc vs. Andhra Pradesh State Electricity Board And Others, (1991) 3 SCC 299*** held:

“27...The HT consumers, including the power intensive consumers, are known power guzzlers and in power intensive industries, electricity is really a raw material. This category of consumers, therefore, forms a distinct class separate from other consumers like LT consumers who are much smaller consumers. There is also a rational nexus of this classification with the object sought to be achieved...”

28. From an economic standpoint, ferro-alloy manufacturing enables substantial value addition within the State by converting locally available raw materials and electrical energy into high-value intermediate and finished construction materials. Instead of exporting raw minerals or surplus electricity at lower margins, the State can promote domestic value addition, thereby increasing Gross State Domestic Product (GSDP), employment, tax revenue, and long-term industrial capacity. Promoting ferro-alloys in the state will lead to increased employment in the state.

29. Ferro-alloy plants operate with consistently high load factors (often >85%). Their operations involve continuous furnace processes that require stable and

uninterrupted electricity supply. This characteristic makes such industries ideal “base-load” consumers for the State grid. A high and predictable base-load demand improves system load factor, reduces demand volatility, enhances generation planning, and makes distribution operations more stable and financially viable.

30. At the national level, India is a significant exporter of ferro-alloys, competing with global producers such as China and South Africa. Since electricity constitutes a major percentage (40-70%) of the total production cost in ferro-alloy manufacturing, competitive and rational power tariffs are directly linked to export competitiveness. By leveraging its hydroelectric potential to provide reliable and reasonably priced power, Arunachal Pradesh can position itself as one of the most competitive ferro-alloy production hubs in Asia, thereby contributing to foreign exchange earnings and national industrial growth.

31. The ferro-alloy and steel sector also acts as a catalyst for downstream industrial development. The establishment of steel mills and alloy plants typically attracts a range of ancillary and downstream MSMEs. This multiplier effect results in the creation of an integrated industrial ecosystem, generating direct and indirect employment and promoting regional development.

32. It is well-established that the Government is empowered to alter industrial policies from time to time according to the assessment based on socio-economic conditions of society. Any creation of potential employment opportunities, coupled with growth of the integrated industrial ecosystem are valid reasons for change of tariffs [*Nava Bharat Ferro Alloys Ltd. v. A.P.S.E.B.*, 1985 SCC OnLine AP 48].

33. Arunachal Pradesh possesses unique geographic and resource-based advantages that remain underutilized. The State's vast hydroelectric potential creates natural synergy with electro-intensive industries such as ferro-alloys. As recognised in the National Electricity Plan, a significant share of India's future non-fossil capacity is expected to come from the North-East region. Ferro-alloy production, being power-intensive, is ideally suited to locations with abundant, clean hydroelectric power. By utilizing locally generated hydropower, the State can reduce transmission losses, avoid distress sale of surplus power, and channel energy into high-value industrial output.
34. The State is currently witnessing significant infrastructure expansion, including highways, strategic border roads, tunnels, bridges, and railway connectivity projects. Presently, a substantial portion of steel required for such projects is transported from distant parts of mainland India, resulting in elevated logistics costs and extended project timelines. Local ferro-alloy and steel production would reduce infrastructure costs, potentially by 15–20%, ensure supply chain reliability, and accelerate project implementation, thereby directly supporting State development objectives.
35. Further, under the Government of India's "Act East" Policy, Arunachal Pradesh occupies a strategic geographic position as a gateway to Myanmar and ASEAN markets. Proximity to Southeast Asia provides a natural export corridor for finished steel and alloy products to emerging economies in the region. From a logistics and freight standpoint, export from Arunachal Pradesh to ASEAN markets may be more commercially viable than export from central or western India, thereby enhancing the State's industrial competitiveness.

36. In view of the foregoing, the ferro-alloy and steel sector presents not merely an industrial opportunity, but a strategic economic lever capable of transforming Arunachal Pradesh into a clean-energy-based manufacturing hub.

REGULATORY PRECEDENT FOR SEPARATE ENERGY-INTENSIVE INDUSTRIAL CATEGORIES

37. It is respectfully submitted that the creation of a separate tariff category for ferro-alloy and other energy-intensive industries is neither novel nor unprecedented. Several State Electricity Regulatory Commissions across India have, in exercise of their powers under Sections 61 and 62 of the Act, recognised the distinct operational characteristics of such industries and introduced differentiated tariff treatment to reflect their high load factor, continuous demand profile, and system-level benefits.

38. An analysis of the Ferro-Alloy and Energy Intensive Industries recognized across various States of India are summarized below:

Tariff Comparison for EHT Ferro- Alloy/ Energy Intensive Industries (FY 2025-26)			
State	EHT Industries Tariff	EHT Ferro-Alloy/ Energy Intensive Tariff	Difference (Rs./kWh)
Chhattisgarh	FC: Rs. 375/kVA/mon EC: Rs. 6.80/kVAh	FC: Rs. 375/kVA/mon EC: Rs. 6.25/kVAh	0.55

Andhra Pradesh	FC: Rs. 475/kVA/mon EC: Rs. 6.75/kVAh (Peak), Rs. 4.60/kVAh (off-peak), Rs. 5.40/kVAh (Normal)	FC: Rs. 475/kVA/mon EC: Rs. 4.90/kVAh	~0.65
Telangana	FC: Rs. 475/kVA/mon EC: Rs. 7.15/kVAh	FC: Rs. 475/kVA/mon EC: Rs. 6.65/kVAh	0.50
Odisha	FC: Rs. 250/kVA/mon EC: Rs. 5.80/kWh	20% energy rebate when PLF above 85% 15% energy rebate when 75%<PLF<85% 10% energy rebate when 65%<PLF<75% *Applicable for the entire consumption	1.16 (20%) 0.87 (15%) 0.58 (10%)
Meghalaya	FC: Rs. 500/kVA/mon EC: Rs. 8.87/kVAh	FC: Rs. 500/kVA/mon EC: Rs. 5.83/kVAh	3.04

39. These regulatory practices demonstrate that tariff differentiation for ferro-alloy and similar industries is grounded in established regulatory jurisprudence and is

fully aligned with Section 62(3) of the Act, which expressly permits classification of consumers based on load factor, consumption pattern, voltage level, and nature and purpose of supply.

40. It is further submitted that such differentiation is not in the nature of subsidy or preferential treatment, but rather a rational and cost-reflective classification based on objective parameters.

PROPOSED REGULATORY FRAMEWORK FOR ENERGY-INTENSIVE INDUSTRIAL CATEGORY

41. In light of the foregoing submissions, the Petitioner respectfully proposes that this Hon'ble Commission introduce a distinct tariff classification titled **"Energy Intensive Industrial (EII) / Ferro-Alloy Consumers"**. This category would recognize industries that demonstrate sustained high electricity consumption, continuous operational profile, and significant contribution to grid stability and industrial development within the State of Andhra Pradesh.

42. The proposed classification would be based on objective, measurable, and transparent eligibility criteria, consistent with Section 62(3) of the Electricity Act, 2003. The suggested eligibility parameters are as follows:

- i. Minimum Contract Demand: 5 MVA or above, connected at High Tension (HT) or Extra High Tension (EHT) levels;
- ii. Minimum Load Factor Threshold: Sustained load factor exceeding 80% (calculated on monthly or annual basis), reflecting continuous and stable consumption patterns typical of electro-thermal industrial processes;.

43. The rationale behind these eligibility parameters is to ensure that the benefit of the category accrues only to consumers who demonstrably provide system-level advantages, including improved load curve stability, enhanced generation utilisation, and reduction in demand fluctuations.

44. Similar classification was upheld by the Hon'ble High Court of Andhra Pradesh in *Ferro Alloys Corporation Ltd., Vizianagaram vs APSEB Somajiguda (supra)*, where “the two basic factors that formed basis for the classification of ‘Power Intensive Industries’ are (i) the intensity of the power the industries consume, more or less as raw-material, and (ii) the cost of power in relation to the cost of the end-product-roughly at 20%. This is the differentia evolved as the rational basis behind the classification of ‘Power Intensive Industries’, as distinct from H.T. Category-1 consumers.”

45. The Petitioner further proposes that the tariff structure under the said category may incorporate one or more of the following regulatory mechanisms:

- i. **Reduced Energy Charge:** A competitive energy charge reflective of the cost advantages arising from high load factor and EHT-level supply, while ensuring full recovery of prudently incurred costs by the distribution licensee;
- ii. **PLF/ Load Factor Linked Rebate:** A graded rebate mechanism linked to achievement of specified load factor thresholds (for example, incremental rebate beyond 80% load factor), thereby incentivising consistent consumption;
- iii. **Long-Term Tariff Certainty:** Provision for medium-to-long-term tariff stability (subject to regulatory control and ARR framework), to facilitate

industrial investment decisions, reduce financial risk, and enhance bankability of capital-intensive projects;

46. It is clarified that the proposed framework does not seek preferential treatment or subsidy, but rather rational tariff differentiation based on objective parameters explicitly recognised under Section 62(3) of the Act. The intent is to align tariff design with actual system benefits and consumption characteristics.

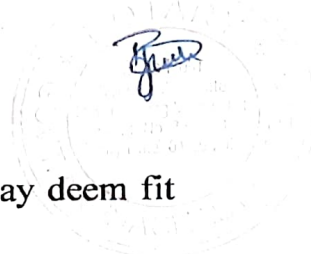
47. The Petitioner respectfully submits that such a structured and criteria-based category would promote regulatory certainty, industrial growth, and efficient grid management, while remaining fully consistent with statutory mandates and established regulatory practice across multiple States.

PRAYERS

48. In view of the above, the Petitioner respectfully prays that this Hon'ble Commission may be pleased to:

- i. Take the present petition on record and grant Petitioner opportunity to clear defects, if any;
- ii. Create a separate tariff category for Ferro-Alloy/ Energy-Intensive Industrial Consumers;
- iii. Consider international and inter-state tariff benchmarks for ferro-alloy industries;
- iv. Provide long-term tariff certainty to enable industrial investment;
- v. Permit the Petitioner to participate in all tariff hearings relevant to this issue;
- vi. Pass any further orders deemed fit in the interest of the State power sector and consumers.

Pass such further order/orders as this Hon'ble Commission may deem fit and proper in the facts and circumstances of the case.


Gannanur
Petitioner



Date: 26 FEB 2026

Place: RDING

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STATE ELECTRICITY REGULATORY COMMISSION,
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Prasam Alloycraft Industries LLP

... Petitioners

Versus

Arunachal Pradesh State Electricity Regulatory Commission

... Respondents

AFFIDAVIT

I, Amarendra Kr. Singh Kauntey, S/o Late Jagnnath Singh, aged about 50 years, working as Vice President, having registered office at Shop No - 15, 2nd Floor, TN Tower, AT Road, Paltan Bazar, Guwahati, Kamrup – 781001, Assam, do hereby solemnly affirm and sincerely state that:

1. I am the authorized signatory of the Petitioner, Prasam Alloycraft Industries LLP. I am competent and authorized to file this Petition on behalf of the Petitioner herein, being well acquainted with the facts of the case set out hereunder.
2. That I have read and understood the contents of the accompanying Petition and I state that the facts stated therein are all true and correct to my

knowledge, as derived from the official records of the Petitioner, maintained in the usual course of its administration.

3. That the documents annexed, if any, herewith this captioned Petition are true copies of their originals or official copy.



VERIFICATION

I, the deponent above named do hereby verify and state that the contents of the affidavit are true and correct to my knowledge and belief. No part of it is false and nothing material has been concealed therefrom.

Verified at **Roing** on this **26** day of **FEB**, 2026.



AUTHENTICATED BY

Sl. No.: 106/2026
Date: 26/02/2026

Bala Dulu
Lower Dibang Valley Dist.


Adv. Bala Dulu
NOC
Dist
Govt of Arunachal Pradesh